

**Specialty Materials**

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June 29, 2007

Nuclear Regulatory Commission, Region II  
Attn: Mr. Jay Henson  
Sam Nunn Atlanta Federal Center  
61 Forsyth St., S.W. Ste. 23T85  
Atlanta, GA 30303

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**SUBJECT: HONEYWELL REGULATORY COMMITMENTS AND CORRECTIVE  
ACTIONS**

Dear Mr. Henson:

This letter is an update on the state of Honeywell's regulatory commitments and corrective actions. Honeywell is committed to establishing a comprehensive Corrective Actions Program. This program is designed to ensure that MTW is operating safely and with appropriate management oversight.

The facility has made significant progress in the commitments management, completion, and closing process: MTW currently has only 4 open commitments out of the beginning total of 194. This progress was acknowledged by the NRC inspectors, M. Crespo and P. Startz, who reviewed objective evidence and verified completion of over 90 regulatory commitments during their site visit in May 2007.

A list of open commitments is enclosed for your review and consideration (Enclosure I). Based on our recent review, implementation of the corrective actions required in LT-10, LT- 27 and LT-42 is on schedule and expected to be completed by the target dates.

One of the commitments, LT-28G, is more extensive than we initially anticipated. This is due to the thrust of the Procedure Phase II Upgrade plan encompassing the following:

- Include more detail in selected Nuclear Services procedures
- Take out tasks performed by non-Nuclear Services departments (such as Maintenance)
- Break apart the selected Nuclear Services procedures by components, and
- Develop several new key administrative procedures.

To accomplish this task, the following actions were taken:

- A staff of four technical writers with nuclear industry experience was put in place.
- The procedure management process was revised by the new Lead Technical Writer to improve the program.
- It was determined that some Nuclear Services procedures were adequate, while others were identified that needed to be rewritten.

- It was determined that the Nuclear Services procedures should be task-oriented vs. component-oriented (organizing the steps by components vs. by tasks would make them disjointed and hard to follow).
- Interface with the Training Group was established to ensure proper training (as needed) and update of training materials.

The Phase II Upgrade Project began by holding working review meetings with applicable operators, engineers, supervisors/foremen, and technical writers. A great amount of time was spent going through selected Nuclear Services procedures line-by-line and rewriting and reorganizing each step into the current format. More detail for each task was included, and tasks for outside organizations were separated out (to be included in the applicable organizations procedures). New valve numbers were also included in the steps, where applicable. Some tasks that needed to be separated from a few of the procedures were broken out into separate procedures. Some procedures were also reviewed, reformatted, and revised. Additionally, checklists were created for each section/task in applicable procedures, making them more user friendly, which will also facilitate In-Hand compliance.

Procedure development is a dynamic and continuous process; that is, as procedures are used, it is expected that more changes and improvements will be requested and made. Also, as periodic reviews are completed, additional changes or improvements are often identified. The iterative process inherent to the management of procedures will ensure continuing improvement of the upgraded procedures. Additionally, some procedures are very lengthy and descriptive, and they will need to be totally rewritten requiring several more hours of development time. Therefore, we propose the extension of commitment LT-28G to November 30, 2009. Honeywell possesses necessary resources and expertise in the procedure development and management program and will be vigilant in the implementation of this on-going process.

If you have any questions/comments or need additional information please feel free to contact Larry Parscale Regulatory Affairs Manager at 618-524-6221.

Thank you for your attention and support.

Sincerely,



David B. Edwards  
Plant Manager, Metropolis Works

Enclosures

**OPEN REGULATORY COMMITMENTS**

<b>Improvement Area</b>	<b>Item Number</b>	<b>Due Date</b>	<b>Description</b>	<b>Comments</b>
LTIP Management Oversight	<b>LT-10</b>	09/29/07	Implement a sustainable preventive maintenance and mechanical reliability program, including data collection and trending, through the Maintenance Excellence Program.	
LTIP Procedures & Policies	<b>LT-27</b>	06/30/08	New wording: Prepare/revise administrative policies and procedures that relate to or impact license related activities.	
LTIP Procedures & Policies	<b>LT-28G</b>	06/30/09	Improve Technical Procedures: Complete Major Revisions for UF6 Procedures/Policies (Phase II)	<b>Propose extension of this Commitment. New due date: 6/30/2009</b>
LTIP Material Condition	<b>LT-42</b>	09/29/07	New wording: Improve the effectiveness of work order planning and scheduling through the Maintenance Excellence Program implementation.	