

Specialty Materials

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US Nuclear Regulatory Commission
Director, Office of Nuclear Material Safety & Safeguards
Attention: Document Control Desk
Mail Stop T8A33, Two White Flint N, 11545 Rockville Pike
Rockville, MD 20852-2738

Docket No. 40-3392
License No. SUB-526

RE: NRC Inspection Report 40-3392/2007-002 and Notice of Violation dated
June 18, 2007

Dear Sirs:

This letter is our response to the NRC Inspection Report 40-3392/2007-002 and
Notice of Violation.

During an NRC inspection conducted on May 7-11, 2007, a violation of NRC
requirements was identified. In accordance with the "General Statement of
Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violation
is listed below:

License Condition 10 of NRC License No. SUB-526, Amendment No. 16,
authorizes, in part, the use of licensed materials in accordance with the
statements, representations, and conditions in Chapters 1 through 7 of the
license application dated January 30, 2003.

Chapter 2, Section 2.6 of the license application, dated January 30, 2003,
requires that "plant written procedures shall be reviewed, revised,
approved, and implemented in accordance with Plant Policy titled
"Procedure Control Policy."

Procedure Control Policy AD-7, states, in part, that procedures written
after March 1, 2004, shall be reviewed, revised, approved, and
implemented in accordance with Procedure MTW-ADM-PRO-0100,
"Development and Implementation of Policies and Administrative
Procedures."

Step 4.11.2 of procedure MTW-ADM-PRO-0100 requires that policies and procedures be followed as written.

Step 4.7.1 of procedure MTW-SAF-LS-001, Special Work Permits, requires that, upon job completion, licensee personnel ensure that their work area is clean.

Contrary to the above, on and before May 9, 2007, after completing the disassembly of equipment that resulted in a significant release of an alkaline-uranium byproduct into the work area, licensee personnel failed to clean up the byproduct. The yellow color of the byproduct provided evidence that wide spread contamination had occurred, that contamination had been allowed to accumulate for some time, and suggested that wide spread contamination in this area was a long term pre-existing condition. During maintenance activities performed on and before May 9, 2007, a contractor's coveralls became contaminated with the byproduct while working in the South pad area and as a result, he suffered a chemical burn to the skin.

Reason for Violation:

A Maintenance job on the Nash Vacuum Pumps (located above the South Pad where this event occurred) had been completed the day before this incident. The area around the pumps was washed down thoroughly; however, this wash water drained to the South Pad. Although some cleaning was performed, the Pad was not completely flushed of this water (which contained KOH) following the maintenance work on the vacuum pumps. Additionally, the pre-job briefing was not sufficient to cover all hazards/PPE requirements, which resulted in the contractor not wearing a rubber suit, which is required for working around corrosive materials.

Previous cleaning of the South Pad was performed routinely, but some residual could be allowed to remain depending upon waste tank availability, other jobs in the area, etc. This has resulted in an accumulation and/or staining on the floor of the Pad.

Actions Taken and Results Achieved:

Immediately following the incident, all work on the South Pad was stopped and the Pad was washed down thoroughly. The Honeywell Project Engineer assigned to this project was informed of the incident and instructed by UF6 operations supervision to discuss South Pad hazards with contract employees who might be performing work in this area. In addition, the UF6 Area Leader instructed UF6 Supervisors to do daily cleaning to the South Pad.

The result is that the South Pad has been kept clean (although some floor discoloration still remains) and a repeat occurrence has not occurred.

Plant-wide safety notices and additional discussions in both A and B Council meetings about this event have increased awareness among plant employees and managers of the need to maintain job area housekeeping during and following work.

Planned Actions:

- Include South Pad hazards awareness in all contractor orientation / training.
- Develop procedure and train all UF6 supervisors/fluorination operators to conduct pre-job briefings for Honeywell Maintenance and contractors to cover South Pad hazards.
- Develop mechanism to insure South Pad is thoroughly cleaned after any KOH-containing liquid is present on the South Pad.

These actions will be complete and full compliance achieved by September 21, 2007.

In regard to other statements made within this subject letter, we wish to make the following comments/clarifications:

In item 6. Radioactive Waste Management (88035/84900) item b. (2) Conclusion, it was stated, "The licensee plans to hire contractors to reduce the inventory of empty ore drums, KOH drums with high pH, and drums containing hard ore during calendar year 2007."

Comment/Clarification:

We plan to reduce the inventory of empty ore drums during 2007 by washing and disposing of them appropriately. The reference to KOH mud and Hard Ore should not have a commitment date at this time because the KOH Mud issue is under discussion with IEPA and the Hard Ore process is not yet operational, although the goal is to begin processing by end of 2007 as correctly stated in paragraph 6b. (1).

If you have additional questions, please contact Mr. Larry Parscale, Regulatory Affairs Manager, at 618-524-6221.

Sincerely

David B. Edwards for DBE

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Plant Manager

cc: File – RMDC
L. Parscale

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