

Specialty Materials

Honeywell
P.O. Box 430
Highway 45 North
Metropolis, IL 62960
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September 18, 2007

(UPS: 301-492-3108)

Mr. Michael Raddatz, Sr. Project Manager
U.S. Nuclear Regulatory Commission
Fuel Facility Licensing Directorate
Enrichment and Conversion Branch
6003 Executive Boulevard, M/S E-2C40
Rockville, MD 20852

SUB-526, Docket #40-3392

Subject: APPLICATION TO AMEND NRC LICENSE AND GRANT CONTINUATION
OF EXEMPTION

Dear Mr. Raddatz,

Attached is our application for amendment to Honeywell Metropolis Works NRC License SUB-526 to replace the existing License Condition LC-22 which states:

“The licensee is hereby granted a continuation of the exemption from the labeling requirements of 10 CFR 20.1904 (a), as described in section 1.7.1 of its license renewal application.”

The amended LC-22 shall state:

“The licensee is hereby granted a continuation of the exemption from the requirements of 10 CFR 1902 (a) and 10 CFR 20.1904 (a), as described in section 1.7.1 of its license renewal application.”

A revised section 1.7.1 of the License Application dated May 12, 2006 shall read:

1.7.1 Exemptions:

Honeywell requests continuation of its current exemption from the requirements of 10 CFR 1902 (a) and 10 CFR 20.1904 (a) as they may apply to **posting of individual radiation areas** and labeling of containers of natural uranium and the resulting intermediates and byproducts of uranium processing operations. In lieu of **posting of individual radiation areas** and labeling each individual radioactive material container as specified in 10 CFR 1902 (a) and 10 CFR 20.1904 (a), Honeywell shall establish one or more areas within or congruent with the restricted area and post all entrance or access points to these area(s) with signs bearing the standard radiation trefoil and the words:

NMSSO |

NuSS

CAUTION

RADIATION AREA

RADIOACTIVE MATERIAL AREA

**Any area or container in this plant (or "beyond this point")
May contain radioactive materials**

The terms "entrance or access point" and "restricted area" are used consistent with the definitions provided at 10 CFR 20.1003. This posting practice is consistent with the guidance provided in Section 7 of Regulatory Guide 8.30, "Health Physics Surveys in Uranium Recovery Facilities" (Ref. 4). In addition, Honeywell maintains other structured means of providing radiological hazard warnings to employees, including radiation safety training and other radiological postings.

Additional information and Honeywell commitments in support of this request are provided in the Attachments I and II.

Also, please correct the license condition 18. The existing license condition 18 D states:

"D. Integrated Safety Analysis Report dated October 26, 2006"

The corrected LC-18 D shall read:

"D. Integrated Safety Analysis Report dated October 25, 2006."

If you have any questions on submitted information or other issues associated with the Metropolis Works Honeywell license amendment, please contact Mr. Larry Parscale, Nuclear Regulatory Affairs Manager, at (618) 524-6221.

Sincerely,



David B. Edwards
Plant Manager

Enclosures

Cc: L. Parscale

Attachment I

Posting History at Honeywell Metropolis Works

Honeywell has been exempt from 10 CFR 20.1902 (a) requirements since 1975. Rather than posting individual radioactive material areas, plant entrances are posted with signs bearing the radiation symbol and the words: **“CAUTION RADIATION AREA RADIOACTIVE MATERIAL AREA. Any area or container in this plant may contain radioactive materials”**.

Over the years, it became evident that this posting arrangement is the best practical way to accommodate the following specific features of the facility:

1. Large area where natural uranium may be processed, transported or stored
2. High volume (over 20 million pounds annually) of processed natural uranium
3. Numerous transient areas emerging during material processing

According to the Regulatory Guide 8.30, “the purpose of the signs is to warn workers where additional precautions to avoid radiation exposure are appropriate”. Honeywell has proven that radiation area posting based on exemption from 10 CFR 20.1902 (a) requirements was adequately meeting its warning purpose.

The Deep Does Equivalent (DDE) data for the past ten years is provided in the Attachment II. According to these statistics, an annual average DDE/person for the past ten years did not exceed 150 millirem. Moreover, the annual average DDE/person in 2006 was 47% lower than in 2000. This data demonstrates that, practicing requested exemptions and other engineering and administrative measures, Honeywell was able to effectively control external radiation exposure by consistently reducing the average annual DDE.

Additional Radiological Hazard Control Measures

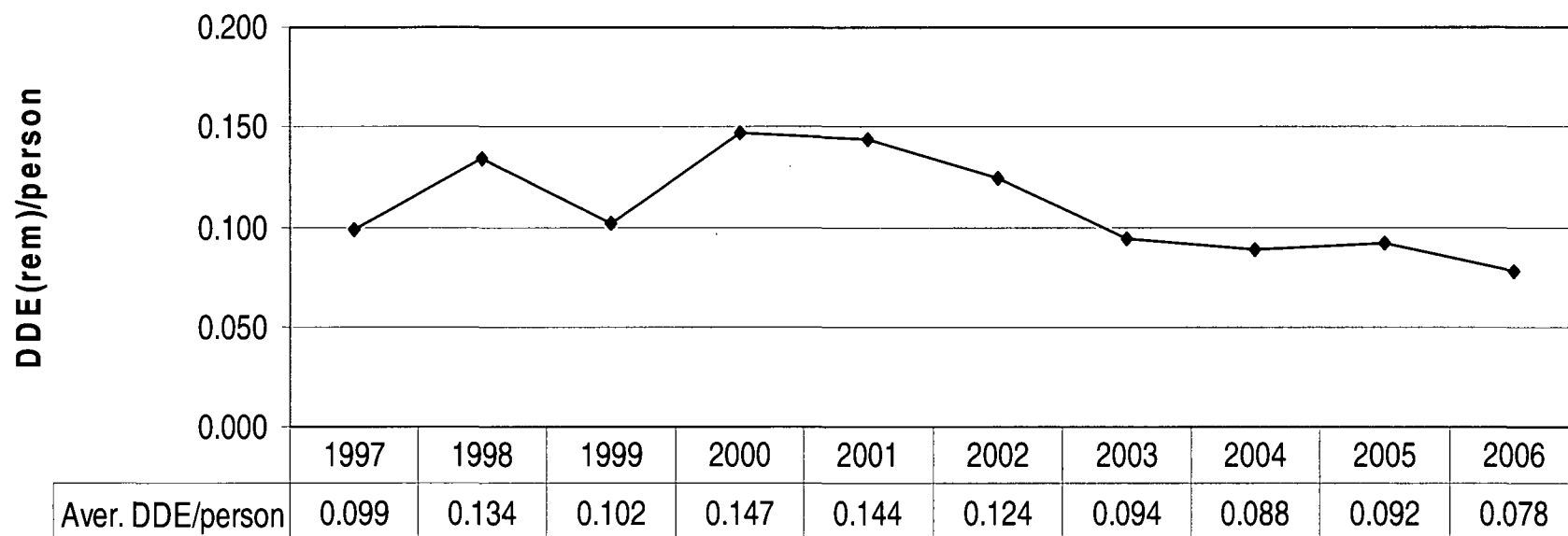
Honeywell will establish additional warning and radiological hazard control measures to supplement conspicuous posting of all entrance or access points to the areas within or congruent with the restricted area with the **“CAUTION RADIATION AREA RADIOACTIVE MATERIAL AREA”** signs.

1. For any process equipment that emits radiation such that an individual could receive a Deep Dose Equivalent exceeding 5 millirem in one hour at a distance of 30 centimeters from the source, Honeywell will:
 - A. Post the process equipment **“CAUTION RADIATION AREA”**
 - B. Establish yellow and magenta floor markings around the equipment

2. In any area where an individual could receive a Deep Dose Equivalent exceeding 50 millirem in one hour at a distance of 30 centimeters from the surface, the licensee will establish additional warning devices or barriers and postings to provide a clear warning of the elevated radiation levels. Additional warning devices may include, as appropriate for the size and configuration of the area, flashing lights or audible alarms. Barriers and postings may include rope, ribbon, cable, chain, or fencing to establish the affected boundaries.
3. Honeywell performs radiation worker training in accordance with 10 CFR 19.12 and Section 2.5 of the license application. Honeywell will enhance radiation worker training making emphasis on the plant's warning and posting practices.
4. Honeywell will improve control, determination and validation of occupational exposure to radiation and radioactive material by upgrading external dosimetry program and providing workers with the state-of-the-art monitoring devices and technologies.

Attachment II

Average External Dose (DDE)



Year

NRC FORM 313
(10-2005)
10 CFR 30, 32, 33,
34, 35, 36, 39, and 40

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB: NO. 3150-0120

EXPIRES: 10/31/2008

Estimated burden per response to comply with this mandatory collection request: 4.4 hours. Submittal of the application is necessary to determine that the applicant is qualified and that adequate procedures exist to protect the public health and safety. Send comments regarding burden estimate to the Records and FOIA/Privacy Services Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to infocollects@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NE0B-10202, (3150-0120), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

APPLICATION FOR MATERIAL LICENSE

INSTRUCTIONS: SEE THE APPROPRIATE LICENSE APPLICATION GUIDE FOR DETAILED INSTRUCTIONS FOR COMPLETING APPLICATION. SEND TWO COPIES OF THE ENTIRE COMPLETED APPLICATION TO THE NRC OFFICE SPECIFIED BELOW.

APPLICATION FOR DISTRIBUTION OF EXEMPT PRODUCTS FILE APPLICATIONS WITH:

DIVISION OF INDUSTRIAL AND MEDICAL NUCLEAR SAFETY
OFFICE OF NUCLEAR MATERIALS SAFETY AND SAFEGUARDS
U.S. NUCLEAR REGULATORY COMMISSION
WASHINGTON, DC 20555-0001

ALL OTHER PERSONS FILE APPLICATIONS AS FOLLOWS:

IF YOU ARE LOCATED IN:

ALABAMA, CONNECTICUT, DELAWARE, DISTRICT OF COLUMBIA, FLORIDA, GEORGIA, KENTUCKY, MAINE, MARYLAND, MASSACHUSETTS, MISSISSIPPI, NEW HAMPSHIRE, NEW JERSEY, NEW YORK, NORTH CAROLINA, PENNSYLVANIA, PUERTO RICO, RHODE ISLAND, SOUTH CAROLINA, TENNESSEE, VERMONT, VIRGINIA, VIRGIN ISLANDS, OR WEST VIRGINIA, SEND APPLICATIONS TO:

LICENSING ASSISTANCE TEAM
DIVISION OF NUCLEAR MATERIALS SAFETY
U.S. NUCLEAR REGULATORY COMMISSION, REGION I
475 ALLENDALE ROAD
KING OF PRUSSIA, PA 19406-1415

IF YOU ARE LOCATED IN:

ILLINOIS, INDIANA, IOWA, MICHIGAN, MINNESOTA, MISSOURI, OHIO, OR WISCONSIN, SEND APPLICATIONS TO:

MATERIALS LICENSING BRANCH
U.S. NUCLEAR REGULATORY COMMISSION, REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, IL 60532-4352

ALASKA, ARIZONA, ARKANSAS, CALIFORNIA, COLORADO, HAWAII, IDAHO, KANSAS, LOUISIANA, MONTANA, NEBRASKA, NEVADA, NEW MEXICO, NORTH DAKOTA, OKLAHOMA, OREGON, PACIFIC TRUST TERRITORIES, SOUTH DAKOTA, TEXAS, UTAH, WASHINGTON, OR WYOMING, SEND APPLICATIONS TO:

NUCLEAR MATERIALS LICENSING BRANCH
U.S. NUCLEAR REGULATORY COMMISSION, REGION IV
611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TX 76011-4005

PERSONS LOCATED IN AGREEMENT STATES SEND APPLICATIONS TO THE U.S. NUCLEAR REGULATORY COMMISSION ONLY IF THEY WISH TO POSSESS AND USE LICENSED MATERIAL IN STATES SUBJECT TO U.S. NUCLEAR REGULATORY COMMISSION JURISDICTIONS.

1. THIS IS AN APPLICATION FOR (Check appropriate item)

- A. NEW LICENSE
- B. AMENDMENT TO LICENSE NUMBER Sub-526 Docket40-3392
- C. RENEWAL OF LICENSE NUMBER _____

2. NAME AND MAILING ADDRESS OF APPLICANT (Include ZIP code)

Honeywell Metropolis Works
2768 North US 45 Road
Metropolis, IL 62960

3. ADDRESS WHERE LICENSED MATERIAL WILL BE USED OR POSSESSED

2768 North US 45 Road
Metropolis, IL 62960

4. NAME OF PERSON TO BE CONTACTED ABOUT THIS APPLICATION

Larry Parscale, Regulatory Affairs Manager

TELEPHONE NUMBER

(618) 524-6221

SUBMIT ITEMS 5 THROUGH 11 ON 8-1/2 X 11" PAPER. THE TYPE AND SCOPE OF INFORMATION TO BE PROVIDED IS DESCRIBED IN THE LICENSE APPLICATION GUIDE.

5. RADIOACTIVE MATERIAL
a. Element and mass number; b. chemical and/or physical form; and c. maximum amount which will be possessed at any one time.

6. PURPOSE(S) FOR WHICH LICENSED MATERIAL WILL BE USED.

7. INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING EXPERIENCE.

8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS.

9. FACILITIES AND EQUIPMENT.

10. RADIATION SAFETY PROGRAM.

11. WASTE MANAGEMENT.

12. LICENSE FEES (See 10 CFR 170 and Section 170.31)

FEE CATEGORY _____ AMOUNT ENCLOSED \$ _____

13. CERTIFICATION. (Must be completed by applicant) THE APPLICANT UNDERSTANDS THAT ALL STATEMENTS AND REPRESENTATIONS MADE IN THIS APPLICATION ARE BINDING UPON THE APPLICANT.

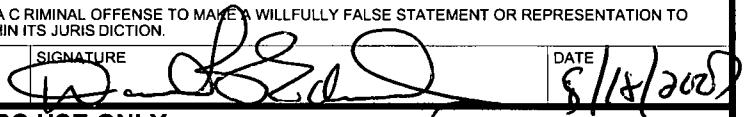
THE APPLICANT AND ANY OFFICIAL EXECUTING THIS CERTIFICATION ON BEHALF OF THE APPLICANT, NAMED IN ITEM 2, CERTIFY THAT THIS APPLICATION IS PREPARED IN CONFORMITY WITH TITLE 10, CODE OF FEDERAL REGULATIONS, PARTS 30, 32, 33, 34, 35, 36, 39, AND 40, AND THAT ALL INFORMATION CONTAINED HEREIN IS TRUE AND CORRECT TO THE BEST OF THEIR KNOWLEDGE AND BELIEF.

WARNING: 18 U.S.C. SECTION 1001 ACT OF JUNE 25, 1948 62 STAT. 749 MAKES IT A CRIMINAL OFFENSE TO MAKE A WILLFULLY FALSE STATEMENT OR REPRESENTATION TO ANY DEPARTMENT OR AGENCY OF THE UNITED STATES AS TO ANY MATTER WITHIN ITS JURISDICTION.

CERTIFYING OFFICER - TYPED/PRINTED NAME AND TITLE

David B. Edwards, Plant Manager

SIGNATURE



DATE

8/18/2008

FOR NRC USE ONLY

TYPE OF FEE	FEE LOG	FEE CATEGORY	AMOUNT RECEIVED	CHECK NUMBER	COMMENTS
			\$		
APPROVED BY				DATE	