

Specialty Materials

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November 1, 2007

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

Subject: REQUEST FOR NRC CONCURRENCE TO DISPOSE OF MTW WASTE AS 10 CFR 40.13 UNIMPORTANT QUANTITIES

Dear Mr. Raddatz:

In our letter dated July 23, 2007 to the NRC on this subject, Honeywell Metropolis Works (MTW) requested NRC's concurrence to disposition scrap materials under 10 CFR 40.13, "Unimportant Quantities of Source Material". The NRC approved that request by letter dated October 1, 2007. However, the NRC concurrence was based on limiting the transfer of scrap material to 90,000 ft³.

We wish to clarify that our initial request was not intended to be for a limited quantity of scrap material, but rather, was a request to ship the subject material on an ongoing and as-needed basis. As explained in subsequent conversations, this material is generated on a continuous basis as a result of the routine and normal work conducted at MTW, and frequent (approximately monthly) "requests to disposition" should not be necessary nor required. Nevertheless, we have been informed this is the current expectation.

Accordingly, we are hereby re-submitting our request for NRC concurrence to dispose of material as Unimportant Quantities under 10 CFR 40.13; however, please note that we have increased quantities and expanded the nomenclature of transferred materials. It is our intent for this submittal to estimate the total quantities and types of materials that will require disposal in 2008, and beginning herewith, request NRC concurrence on an annual basis. For example:

- We expect the plant's ore drums washing/crushing/packing facility will be operational in early 2008, and this will increase the number of drums cleared annually under the unimportant quantity provision to 54,000.
- We have also included calcium fluoride in the list of materials for burial at WCS. Honeywell's Material License SUB-526, Amendment 0, condition No. 23 states that "the average concentration of uranium in calcium fluoride released to each commercial organization, for any consecutive 12-month period, shall not exceed 213 pCi/gram." Honeywell has been using this license condition for calcium fluoride recycling. However, considering transportation requirements posed by the changed DOT regulations on unimportant quantities of source material, Honeywell may prefer a burial option to recycling.

- Dry Active Waste (D.A.W.) is another material category planned for transfer. This waste consists of Personal Protective Equipment (PPE), paper, filter media, building insulation, floor sweepings, plastic and rope cleared under the unimportant quantity provision.

Materials and quantities to be transferred to WCS for burial in 2008 are specified in the table:

Material	Avg. Monthly Quantity	Quantity for 2008	Volume (ft ³) For 2008
Steel Drums	4,500 drums	54,000 drums	70,200
Wooden pallets and shoring material	2,500 pounds	30,000 pounds	16,000
Scrap Metal	1.7 tons	20 tons	54,000
Concrete	25 tons	300 tons	5,000
Soil and Gravel	25 tons	300 tons	5,000
Calcium Fluoride (CaF ₂)	1,000,000 pounds	12 x 10 ⁶ pounds	200,000
Trench Mud	2.0 tons	25 tons	500
D.A.W.	10 tons	120 tons	25,000

Accordingly, we hereby request NRC concurrence with MTW's intent to transfer the above listed materials as unimportant quantity pursuant to 10 CFR 40.13.

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

Sincerely,



David B. Edwards
Plant Manager

cc: Larry V. Parscale

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