

Specialty Materials

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US Nuclear Regulatory Commission
Director, Office of Nuclear Material Safety & Safeguards
Attention: Document Control Desk
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Docket No. 40-3392
License No. SUB-256

Dear Sir or Madam:

This letter is our response to the NRC Inspection Report 40-3392/2007-007 and Notice of Violation dated January 11, 2008.

During an NRC inspection conducted on December 10-14, 2007, a violation of NRC requirements was identified. In accordance with the requirements of NUREG 1600, "General Statement of Policy and Procedure for NRC Enforcement Actions," the violation from Reference A is listed below:

License Condition 18 of NRC License No. SUB-526, Amendment No. 0 requires that licensed activities at the Honeywell Metropolis Works Facility be conducted in accordance with the statements, representations and conditions (or as revised by change and/or configuration management processes described therein) in the Integrated Safety Analysis Report dated October 26, 2006.

License Condition 19 of NRC License No. SUB-526, Amendment No. 0), also states that within 180 days of the issuance of the renewed license, all Plant Features and Procedures, to be designated PFAP, shall be developed and implemented within the ISA.

The Table 9-1 of the ISA, designates manual shutdown in response to hydrogen analyzer failure or malfunction as PFAPs 26 and 28.

Section 9.4.1 of the ISA, states, in part, that management measures will ensure that PFAPs are designed, implemented, and maintained, as necessary, to be available and reliable to perform their safety function when needed.

Contrary to the above, prior to December 10, 2007, the licensee failed to implement management measures to ensure that PFAPs were designed, implemented, and maintained, as necessary, to be available and reliable to perform their safety function when needed. Specifically, the licensee did not implement management measures for PFAPs 26 and 28, which required manual shutdown in response to hydrogen analyzer failure or malfunction.

This is a Severity Level IV violation (Supplement VI).

1) Reason for violation:

Honeywell acknowledges that procedure MTW-EOP-GSO-0600, Green Salt Emergency Operations, Revision 1, did not incorporate specific steps for manual shutdown of the process in the case of hydrogen analyzer instrument alarm or malfunction. This procedure had previously been marked up to incorporate this information prior to the inspection, but this revision received a lower priority consistent with normal plant work practices. However, Honeywell wishes to deny this violation for the following reasons:

- It should be noted the 2 PFAPs associated with this violation, PFAPs 26 and 28, are identified in the ISA as being associated with accident scenarios of low consequence and risk, and have an acceptable unmitigated risk value. As such, they are not required by NRC (ref. NUREG 1513, Sect. 2.6.1.1, Consequences of Concern) to be addressed as PFAPs by plant procedures.
- Honeywell procedure MTW-ADM-OPS-0121, Management of Plant Features and Procedures, includes PFAPs 26 and 28 in Table 2, Non-Safety Significant Functions, which is consistent with the ISA analysis. This is further clarified in procedure MTW-ADM-OPS-0121, Section 4.1, which states, "Table 2 is provided for informational purposes only. It describes PFAPs associated with the other 20 accident scenarios evaluated to have an acceptable unmitigated risk value.... PFAPs listed in Table 2 will be managed according to the normal work management process."
- Section 6.4.3.2, IROFS and Management Measures, pg. 6-4 of NUREG 1520, also states "the applicant must also review management measures to assure the availability and reliability of such IROFs, when they are required to perform their safety functions. Management measures may be graded commensurate with risk."
- It is Honeywell's position that management measures as applied to PFAPs 26 and 28 were consistent with a low consequence, low risk accident scenario, as provided for in regulatory guidance.

2) Actions taken and results achieved:

Procedure MTW-EOP-GSO-0600, Green Salt Emergency Operations, was revised (Revision 2, effective January 11, 2008) to include hydrogen analyzer failure or fault indication as an entry condition for the procedure. Operator training for this revision was completed January 21, 2008. These actions ensure this item is in compliance.

3) Corrective actions planned to avoid further violations:

This issue has been reviewed with the Honeywell MTW management team to ensure future procedure revisions associated with safety significant PFAPs receive sufficient priority and follow through to completion.

4) Date when full compliance will be achieved:

It is Honeywell's position that conditions described in the violation are not contrary to the terms and conditions of the license or Integrated Safety Analysis Report. Actions taken have been consistent with the normal work management process.

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

Sincerely



David B. Edwards
Plant Manager

cc: File – RMDC
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