

Specialty Materials

Honeywell
P.O. Box 430
Highway 45 North
Metropolis, IL 62960
618 524-2111
618 524-6239 Fax

May 12, 2008

US Nuclear Regulatory Commission
ATTN: Document Control Desk
Director, Office of Nuclear Material Safety and Safeguards
USNRC, Washington, DC 20555-0001

(UPS: 301-415-8147)

SUB-526, Docket #40-3392.

Subject: AMENDMENT APPLICATION TO MODIFY LICENSE CONDITION 20 OF
USNRC SOURCE MATERIALS LICENSE

Attached is Honeywell's application for amendment to Metropolis Works USNRC Source Materials License SUB-526 to revise the existing license condition LC-20:

For changes to the site, structures, processes, systems, components, computer programs, and activities of personnel that do not require prior NRC approval, Honeywell shall prepare and submit to the NRC, within 30 days after the end of the calendar year in which the change was implemented, a brief summary of all such changes. For all changes that affect the MTW ISA, Honeywell shall submit to the NRC, within 30 days after the end of the calendar year in which the changes were implemented, either a revised ISA, or revised ISA pages, as appropriate.

The revised LC-20 shall state:

*For changes to the site, structures, processes, systems, components, computer programs, and activities of personnel **within the identified plant features and procedures and safety control boundaries** that do not require prior NRC approval, Honeywell shall prepare and submit to the NRC, within 30 days after the end of the calendar year in which the change was implemented; a brief summary of all such changes. For all changes that affect the MTW ISA, Honeywell shall submit to the NRC, within 30 days after the end of the calendar year in which the changes were implemented, either a revised ISA, or revised ISA pages, as appropriate.*

According to Section 2.6.3, Configuration Control, of the Application for Renewal of USNRC Source Materials License SUB-526, Honeywell has established and thoroughly maintains a configuration management system to evaluate, implement, and track all the changes to the site, structures, systems, components, computer programs, and activities of personnel. The revised wording will make LC-20 configuration change submittal requirement more explicit and consistent with the analogous requirement of 10 CFR 70.72 (d)(2). Moreover, the aforementioned LC-20 modification will allow enhanced focus on changes affecting Honeywell's safety program elements, such as process safety information, integrated safety analysis, and management measures.

NM5501

The corresponding revised section 2.6.3 (pages 2-8 and 2-9) of the Application for Renewal of USNRC Source Materials License SUB-526, dated May 12, 2006 shall read:

2.6.3 Configuration Control

Honeywell shall establish a configuration management system to evaluate, implement, and track each change to the site, structures, processes, systems, components, computer programs, and activities of personnel. This system shall be documented in written procedures and assure that the following issues are identified and addressed prior to implementing a proposed change:

- *The technical basis for the change;*
- *Impact of the change on safety and health and control of licensed material;*
- *Modifications to existing operating procedures including any necessary training or retraining before implementation of the change;*
- *Authorization requirements for the change;*
- *For temporary changes, the approved duration of the change;*
- *The impact of the change on the facility's documented Integrated Safety Analysis (ISA), Safety Demonstration Report, or other safety program information; and*
- *Any required changes to the facility's USNRC license.*

Honeywell may implement changes to the site, structures, processes, systems, components, computer programs, and activities of personnel without prior approval of the USNRC if the proposed change does not:

- *Create new types of accident sequences that, unless mitigated or prevented, would exceed regulatory requirements and that have not previously been described in the ISA; or*
- *Use new processes, technologies, or control systems for which Honeywell has no prior experience; or*
- *Remove a Plant Feature or Procedure (PFAP) that is relied on for safety as identified in the MTW ISA, without a replacement PFAP that is at least equivalent; or*
- *Alter any item relied on for safety, as listed in the MTW ISA, that is the sole item preventing or mitigating an accident sequence that exceeds regulatory requirements; or*
- *Create any condition or configuration that is otherwise prohibited by this section, license condition, or order.*

For changes that require prior USNRC approval, Honeywell shall submit to the USNRC a request for amendment of the license.

*For changes that do not require prior USNRC approval, Honeywell shall prepare, within 30 days after the end of the calendar year in which the change was implemented, a brief summary of all changes **within the identified plant features and procedures and safety control boundaries**. For all changes that affect the MTW ISA, Honeywell shall submit to the NRC, within 30 days after the end of the calendar year in which the changes were implemented, a revised ISA or revised ISA pages, as appropriate.*

For any change approved by Honeywell for implementation, Honeywell shall promptly update affected site documentation (e.g., policies, procedures, drawings, and training materials).

Honeywell shall maintain records of changes to the facility carried out under this section for no less than five years following implementation of the change. These records shall include the written evaluation that provides the bases for the determination that the changes do not require prior USNRC approval.

Within ninety days of issuance of the revised USNRC license, Honeywell shall identify those procedures that are considered PFAP, as necessary to support the MTW ISA, and update the ISA accordingly to reflect these procedures. The affected procedures shall include procedures that address operator attentiveness, overtime, and procedural compliance.

Honeywell also requests to update another section of the Application for Renewal of USNRC Source Materials License SUB-526, dated May 12, 2006. Section 1.6.1.3 (pages 1-4 and 1-5) currently states the following:

1.6.1.3 Cylinder Lifting, Handling, and Storage

Honeywell shall limit the likelihood and consequences of any incidents involving handling of filled UF₆ cylinders as follows:

- Honeywell shall establish administrative controls over UF₆ cylinder lifting and handling processes.
- Honeywell shall limit lifting and handling of filled UF₆ cylinders consistent with the plant layout and construction. Filled cylinders are lifted only to the height necessary to provide clearance over any cylinders located in the intervening fill spots (e.g., the cylinder diameter plus a safety margin determined by the crane operator). Cylinders are then moved horizontally approximately 50 feet (depending on the originating fill spot) to a beam scale buggy for final product weight determination. Following final weight determination, cylinders are lifted several feet vertically and approximately ten feet horizontally for placement on a mobile storage buggy, which is then moved approximately 150 feet to a designated storage/cooling area.
- Filled UF₆ cylinders are stored on the mobile storage buggy for four or more days to allow for complete solidification of the UF₆ product prior to shipment or transfer to a designated cylinder storage area.

An updated text shall read:

1.6.1.3 Cylinder Lifting, Handling, and Storage

Honeywell shall limit the likelihood and consequences of any incidents involving handling of filled UF₆ cylinders as follows:

- Honeywell shall establish administrative controls over UF₆ cylinder lifting and handling processes.
- Honeywell shall limit lifting and handling of filled UF₆ cylinders consistent with the plant layout and construction. Filled cylinders are lifted only to the height necessary to provide clearance over any cylinders located in the intervening fill spots (e.g., the

cylinder diameter plus a safety margin determined by the crane operator). Cylinders are then moved horizontally approximately 50 feet (depending on the originating fill spot) for final product weight determination. Following final weight determination, cylinders are lifted several feet vertically and approximately ten feet horizontally for placement on a mobile storage buggy, which is then moved approximately 150 yards to a designated storage/cooling area.

- *Filled UF₆ cylinders are stored on the mobile storage buggy for four or more days to allow for complete solidification of the UF₆ product prior to shipment or transfer to a designated cylinder storage area.*

This update will remove the requirement for "a beam scale buggy" to be used for final product weight determination and allow improvement of the final weight measurements using the best technology available for these purposes. The beam scale buggy is not a PFAP (Plant Features and Procedures) related component. A safety evaluation will be performed for a beam scale buggy replacement according to the plant's management of change policies and procedures.

This update will also correct a typographical error and replace an incorrect unit "feet" with the correct unit "yard."

Additionally, Honeywell requests to make the following changes to the Safety Demonstration Report for USNRC Source Materials License SUB-526 (revision 2, dated January 31, 2008):

1. Discontinue use of Appendix B – Summary of Qualifications of Key Personnel.

Honeywell believes that the most effective way to keep information on qualifications of key personnel current and accurate is by incorporating all the organizational changes as soon as practicable and making this information readily available upon the NRC's request.

This change will result in deleting the following SDR items:

- a. Section 3.5, Education and Experience of Key Personnel, Table of Contents, page ii
 - b. Appendix B – Summary of Qualifications of Key Personnel, Table of Contents, page iv
 - c. Section 3.5, Education and Experience of Key Personnel, page 3-2
 - d. Appendix B – Summary of Qualifications of Key Personnel, pages B-1 through B-4
2. Modify section 1.4, Site Description, adding more details on Ohio River shoreline activities and deleting dated information regarding agricultural use of 10% of the site.

The current SDR section 1.4 (page 1-2) states:

1.4 Site Description

1.4.1 Geographical

The Honeywell Metropolis Plant is located on approximately 1000 acres of land in Massac County at the southern tip of Illinois. The primary site perimeter is formed by U.S. Highway 45 to the north, the Ohio River to the south, an industrial coal blending plant to the west and privately-owned, developed land to the east. Plant operations are conducted

in a fenced restricted area covering approximately 59 acres in the north-central portion of the site. Honeywell also owns approximately 100 acres of land directly across U.S. Highway 45, N-NE of the plant.

The plant site is located in gently rolling hills, typical of Southern Illinois, and is bounded on the south by the Ohio River flood plain. The surface water drainage of the site is to the south into the Ohio River.

Approximately 25% of the site consists of idle agricultural fields which are returning to their natural state, approximately 10% is used for agriculture (soybeans or corn), and the remaining property is heavily wooded, second-growth timber.

The revised section 1.4 shall read:

1.4 Site Description

1.4.1 Geographical

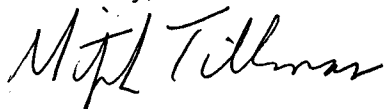
*The Honeywell Metropolis Plant is located on approximately 1000 acres of land in Massac County at the southern tip of Illinois. The primary site perimeter is formed by U.S. Highway 45 to the north, the Ohio River to the south, an industrial coal blending plant to the west and privately-owned, developed land to the east. **Honeywell may lease some portion of the Ohio River shoreline for use in commercial barge activities. A lease, if put in place, will impose appropriate limitations on use of the shoreline and restrict land activities. Any activities conducted by the tenant shall be bounded by the accident analyses documented in the ISA.** Plant operations are conducted in a fenced restricted area covering approximately 59 acres in the north-central portion of the site. Honeywell also owns approximately 100 acres of land directly across U.S. Highway 45, N-NE of the plant.*

The plant site is located in gently rolling hills, typical of Southern Illinois, and is bounded on the south by the Ohio River flood plain. The surface water drainage of the site is to the south into the Ohio River.

*Approximately **35%** of the site consists of idle agricultural fields which are returning to their natural state, and the remaining property is heavily wooded, second-growth timber.*

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

Sincerely,



Mitch Tillman
Plant Manager

Enclosure

Cc: U.S. Nuclear Regulatory Commission (UPS: 301-415-6334)
Attention: Michael Raddatz, NMSS
Fuel Cycle Licensing Branch
Mail Stop T-8A33
Two White Flint North, 11545 Rockville Pike
Rockville, MD 20852-2738

U.S. Nuclear Regulatory Commission (UPS: 301-415-6334)
Attention: Tilda Liu
Fuel Cycle Licensing Branch
Mail Stop T-8A33
Two White Flint North, 11545 Rockville Pike
Rockville, MD 20852-2738

Larry Parscale
Michael Greeno
Lidia Litinski

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, NEOB-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:

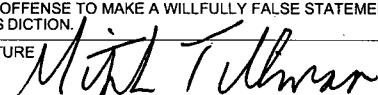
ILLINOIS, INDIANA, IOWA, MICHIGAN, MINNESOTA, MISSOURI, OHIO, OR WISCONSIN, SEND APPLICATIONS TO:

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) <input type="checkbox"/> A. NEW LICENSE <input checked="" type="checkbox"/> B. AMENDMENT TO LICENSE NUMBER <u>Sub-526 Docket40-3392</u> <input type="checkbox"/> 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 Mitch Tillman, Plant Manager		SIGNATURE 	DATE 5/12/08

FOR NRC USE ONLY

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