September 30, 2008

MEMORANDUM TO: Michael D. Tschiltz, Deputy Director
Fuel Facility Licensing Directorate
Division of Fuel Cycle Safety
and Safeguards
Office of Nuclear Materials Safety
and Safeguards

THRU: Brian W. Smith, Chief **/RA/**
Enrichment and Conversion Branch
Fuel Facility Licensing Directorate
Division of Fuel Cycle Safety
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Office of Nuclear Materials Safety
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FROM: Tilda Y. Liu, Senior Project Manager **/RA/**
Enrichment and Conversion Branch
Fuel Facility Licensing Directorate
Division of Fuel Cycle Safety
and Safeguards
Office of Nuclear Materials Safety
and Safeguards

SUBJECT: SEPTEMBER 26, 2008 TELEPHONE CONFERENCE ON SMALL CYLINDER FILLING PROCESS APPROVAL AND LICENSE AMENDMENT REQUEST, HONEYWELL METROPOLIS WORKS (TAC NO. L32450)

The U.S. Nuclear Regulatory Commission staff and representatives of Honeywell Metropolis Works (MTW) (i.e., the licensee) held a telephone conference on September 26, 2008 to discuss the staff's draft requests for additional information (D-RAIs) concerning Honeywell MTW's small cylinder filling process approval and license amendment request.

The conference call was useful in clarifying the intent of the staff's D-RAIs. On the basis of the discussion, Honeywell MTW representatives were able to better understand the staff's questions. No staff decisions were made during the telephone conference, and Honeywell MTW agreed to provide information for clarification.

Enclosure 1 provides a list of the telephone conference participants. Enclosure 2 contains a listing of D-RAIs including a brief description on the status of the items. Honeywell MTW has had an opportunity to review and comment on this summary.

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

Enclosures: As stated

cc w/enclosures: Larry Parscale, Honeywell

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NAME	T. Liu	V. Williams	B. Smith
DATE	09/27/08	09/29/08	09/30/08

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LIST OF PARTICIPANTS FOR TELEPHONE CONFERENCE TO DISCUSS

DRAFT REQUESTS FOR ADDITIONAL INFORMATION

HONEYWELL METROPOLIS WORKS

SMALL CYLINDER FILLING PROCESS APPROVAL AND LICENSE AMENDMENT REQUEST

September 26, 2008

NAME	AFFILIATION
Breeda Reily	NRC/NMSS/FCSS
Jeannette Arce	NRC/NMSS/FCSS
Tilda Liu	NRC/NMSS/FCSS
Lidia Litinski	Honeywell
Al Stratemeyer	Honeywell
Dan Huffman	Honeywell
Larry Parscale	Honeywell

Enclosure 1

TELEPHONE CONFERENCE TO DISCUSS

DRAFT REQUEST OF ADDITIONAL INFORMATION (RAI)

HONEYWELL METROPOLIS WORKS

SMALL CYLINDER FILLING PROCESS APPROVAL AND LICENSE AMENDMENT REQUEST

The NRC staff has reviewed Honeywell MTW submittal dated July 17, 2008, and identified that additional information or clarification of existing information is needed from the licensee. The staff provided the following draft requests for additional information (D-RAIs) to Honeywell MTW on September 25, 2008. On September 26, 2008, the staff held a telephone conference with Honeywell to clarify these questions prior to formal RAI questions being sent. On the basis of the discussion, Honeywell MTW agreed to provide its responses. A summary of the D-RAIs discussed and the proposed actions are presented below.

D-RAI-1

In order to evaluate the applicability of a categorical exclusion under 10 CFR 51.22, the licensee is requested to evaluate applicability associated with the following criteria:

- there are no revisions or enhancements required to the site's existing environmental monitoring programs as a result of the proposed amendment.
- the environmental impacts as documented in the Honeywell's Environmental Report remain valid.
- the equipment/waste volumes to be addressed at the time of plant decommissioning would not be significantly impacted.
- there are no significant changes in the types or significant increases in the amounts of any effluents that would be released offsite.
- there would be no significant increase in individual or cumulative occupational radiation exposure as a result of the proposed amendment.
- there is no significant construction impact as a result of the proposed amendment.

DISCUSSION: Honeywell indicated that the question is clear. This draft RAI will be sent as a formal RAI.

D-RAI-2

Document No. 2, "Description and Technical Justification of the New Process, UF6 Cylinder Filling Using the Distillation Sampling System," page 4, 2nd and 3rd paragraph under "30B Cylinder Filling" states:

> Honeywell will put no more than **100 lbs.** into the cylinder using the UF6 Continuous Sampling System. Therefore, this process is essentially safe from a vessel overfill. All **30B** cylinders filled with more than **2500 lbs.** of UF6 will be filled in a regular Distillation fill spot.

The licensee is requested to clarify whether the UF6 continuous sampling system will only be used to fill up to 100 lbs or provide other appropriate explanation.

DISCUSSION: Honeywell indicated that the question is clear. This draft RAI will be sent as a formal RAI.

D-RAI-3

Document No. 7, Proposed Changes to the Honeywell Metropolis Works Integrated Safety Analysis Report, page 5, "Safety Controls for Cylinder Filling and Handling":

Section 9.3.1 currently states: "Plant administrative fill limits for UF6 cylinders have been established at least 100 pounds less than those listed in the American National Standards Institute (ANSI) Standard N14.1, as applicable at the manufacture date of the UF6 cylinder."

Section 9.3.1 would be revised to read: "Plant administrative fill limits for UF6 cylinders have been established less than those listed in the American National Standards Institute (ANSI) Standard N14.1, as applicable at the manufacture date of the UF6 cylinder."

Explain how this revision in the administrative limit was established.

DISCUSSION: Honeywell indicated that the question is clear. This draft RAI will be sent as a formal RAI.

D-RAI-4

Document No. 7, Proposed Changes to the Honeywell Metropolis Works Integrated Safety Analysis Report, page 4 states:

> Numerous safety features are installed in the distillation filling process to reduce the potential for overfilling of a cylinder. Cylinder filling operations are not conducted unless at least two independent methods exist for determining the amount of UF6 filled into the cylinder. These controls are as follows:
>
> - A flow totalizer monitors the total flow of UF6 into a cylinder. If the flow total exceeds an upper set point, the filling process is automatically stopped.
> - Load cells are provided at each of the filling stations. If the weight detected by the load cells exceeds an upper set point, the filling process is automatically stopped. A redundant set of load cells is also provided at each fill station to assure that weighing is correct.

Since each of the Model 48, 12B, and 30B cylinders will have a different set point, based on its administrative limits, how will Honeywell ensure that the appropriate set point is used for a given-sized cylinder?

DISCUSSION: Honeywell indicated that the question is clear. This draft RAI will be sent as a formal RAI.