September 30, 2008

Mitch Tillman
Plant Manager
Honeywell Metropolis Works
P.O. Box 430
Highway 45 North
Metropolis, IL 62960

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION REGARDING SMALL CYLINDER FILLING PROCESS APPROVAL AND LICENSE AMENDMENT REQUEST, HONEYWELL METROPOLIS WORKS (TAC NO. L32450)

Dear Mr. Tillman:

The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed Honeywell Metropolis Works' (MTW) submittal regarding small cylinder filling process approval and license amendment request transmitted by letter, dated July 17, 2008. On August 12, 2008, the staff accepted your submittal for detailed review. Our review of your request has identified that additional information (RAI) is needed before final action can be taken on your submittal.

The additional information, specified in the enclosure, should be provided within 7 days from the date of this letter. This time frame has been agreed upon between NRC and Honeywell MTW representatives as resulted from the telephone conference held on September 26, 2008.

In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR), Section 2.390 of the NRC's Rules of Practice, a copy of this letter will be available electronically from the Publicly Available Records component of NRC Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC Website at http://www.nrc.gov/reading-rm/adams.html.

If there are any questions regarding this action, please contact Ms. Tilda Liu of my staff at (301) 492-3217 or via e-mail at tilda.liu@nrc.gov.

Sincerely,

/RA/

Brian W. Smith, Chief
Enrichment and Conversion Branch
Division of Fuel Cycle Safety
and Safeguards
Office of Nuclear Material Safety
and Safeguards

Enclosure: As stated

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

cc: Larry Parscale, Honeywell

Mitch Tillman
Plant Manager
Honeywell Metropolis Works
P.O. Box 430
Highway 45 North
Metropolis, IL 62960

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DISTRIBUTION:
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NAME	V. Williams	T. Liu for	B. Smith
DATE	9/30/08	9 /27/08	09/30/08

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REQUEST OF ADDITIONAL INFORMATION
HONEYWELL METROPOLIS WORKS
SMALL CYLINDER FILLING PROCESS APPROVAL AND LICENSE AMENDMENT REQUEST
(TAC NO. L32450)

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.

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.

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 ANSI Standard N14.1, as applicable at the manufacture date of the UF6 cylinder.”

Explain how this revision in the administrative limit was established.

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?