

Specialty Materials

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May 11, 2009

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Ms. Tilda Liu, Project Manager
Advanced Fuel Cycle, Enrichment, & Uranium Conversion
Special Projects and Technical Support Directorate
Division of Fuel Cycle Safety & Safeguards
Office of Nuclear Material Safety & Safeguards
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Two White Flint N., 11545 Rockville Pike
Rockville, MD 20852-2738

SUB-526, Docket # 40-3392

Subject: MTW RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION
RE: HONEYWELL METROPOLIS WORKS REQUEST, DATED MARCH
27, 2009, TO AMEND ITS LICENSE CONCERNING SURFACE
CONTAMINATION LEVELS (TAC NO. L32712)

Dear Ms. Liu:

This letter is Honeywell response to the NRC Request for Additional Information regarding Honeywell Metropolis Works (MTW) request to amend its license concerning surface contamination levels dated March 27, 2009 (TAC No. L32712).

Following is the MTW response to the RAI questions:

- 1) In your request you indicate that Regulatory Guide (RG) 8.30, "Health Physics Surveys in Uranium Recovery Facilities," issued May 2002, should serve as an appropriate guide for your facility. Please provide additional information and justification on how you propose to apply RG 8.30. Specifically:
 - i. Please explain why the RG 8.30 guidelines should apply for "intermediate" and "uncontrolled areas", where source material is not expected to be present, and why these areas should have increased allowable contamination levels.

The inclusion of Intermediate and Uncontrolled Areas is intended to have the reference be consistent within the license application. The limits for intermediate and uncontrolled areas will be managed within MTW-ADM-HP-0100 RADIOLOGICAL PROTECTION PROGRAM (RPP) section 4.9 Contamination Control. The Intermediate and Uncontrolled Area contamination limits will not be changed, and continue to be established at 200 dpm/100cm².

- ii. Please explain how the new "action levels" will help ensure that contamination levels and exposures are as low as reasonably achievable and whether action levels will be gradually adjusted.

The request for a license amendment is to provide an appropriate action level which will ensure that contamination levels and exposures are as low as reasonably achievable. The new action levels are based on a survey technique and methodology which is consistent with accepted industry practices. The previously used smear media, which was a one inch smooth surface smear, and previously used methodology, which only required personnel to survey in the high traffic areas, did not provide a true representation of removable contamination. The new action level (110 kdpm/100cm², 50% of the recommendation from RG 8.30) is applied by smear surveys taken randomly in the uranium processing areas. The new action level is challenging and achievable. To ensure the new action level is consistent with the objectives of contamination improvement efforts, the ALARA Committee will adopt and place into the plant's Radiation Protection Program (RPP), in section 4.2, a new responsibility for the ALARA Committee. The new responsibility will be for the ALARA Committee to annually review the action level in the uranium processing areas with the goal of reducing the action level by a significant fraction each year, typically 10%.

- 2) Table 4.7 provides a foundation for the development of site procedures covering survey frequencies, contamination action levels, and time frames for action. Please provide justification for removing Table 4.7 from your license application and the basis that will be used, in each area of your facility, for determining survey frequencies, contamination action levels, and time frames for action.

Honeywell is proposing taking the contamination table out of the license and moving it to the RPP. The contamination levels and frequencies will be managed from the procedure which will be used to communicate this change to affected facility personnel. We are not intending to change the frequencies or the limits for uncontrolled and intermediate areas. The controlled area limit will change to the limit described above. This approach is consistent with Radiation Protection Program objectives and ALARA Committee responsibility as described in 1.ii above.

- 3) You have requested to replace the current wording in 3.2.6 of your License Application with: "MTW performs surveys for surface contamination in operating and clean areas of the Honeywell Metropolis Works facilities in accordance with the guidelines contained in USN RC Regulatory Guide 8.30, *Health Physics Surveys in Uranium Recovery Facilities*, Revision 1." Please provide additional information concerning how the term "operating and clean areas" of the Honeywell Metropolis Works facilities will be applied to areas designated as Controlled Areas, Intermediate Areas, and Uncontrolled Areas. Are there "operating and clean areas" outside of the restricted areas and if so, what surface contamination monitoring requirements will apply?

Operating Areas (Controlled Areas) are plant areas in which uranium is processed and could be present in unencapsulated form. Clean Areas (Uncontrolled Areas) are areas of the plant that are plant areas where food may be consumed, locker rooms, non-

radioactive fluorine based chemical areas, etc...The definitions below are provided from Honeywell Metropolis Works Safety Demonstration Report dated May 12, 2006.

Controlled Areas: *Plant areas in which uranium is processed and could be present in unencapsulated form.*

Intermediate Areas: *Production areas for non-radioactive fluorine based chemicals, and plant support facilities.*

Uncontrolled Areas: *Plant areas where food may be consumed, locker rooms, and entrance/exit areas from the plant.*

We hope that this response provides sufficient information for NRC review. If you have additional questions, please contact Mr. Mike Greeno, Acting Regulatory Affairs Manager, at 618-309-5005.

Sincerely,



Mitch Tillman
Plant Manager

Cc: M. Greeno
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