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(UPS: 301-415-8147)

U.S. Nuclear Regulatory Commission

SUB-526, Docket #40-3392

RE: AMENDMENT REQUEST TO MODIFY HONEYWELL LICENSE APPLICATION CONCERNING CONTAMINATION LEVELS

This letter is in response to a telephone conference held with NRC staff on June 23, 2009 and a follow up correspondence, *June 23, 2009, Telephone Conference Summary on License Amendment Request to Modify Contamination Levels, Honeywell Metropolis Works (TAC NO. L32712*). Both communications concerned Honeywell MTW's request to amend the Honeywell Source Material License SUB-526, dated March 27, 2009, involving changes to the facility surface contamination limits. As a result of the conference call and the following communication summary, it was recognized that the initial submittal dated March 27, 2009, did not contain sufficient information. The purpose of this letter is:

1. Modify initial license amendment request dated March 27, 2009, and
2. Provide supplemental information to Honeywell MTW's license amendment request.

1. Honeywell Source Material License SUB-526 Amendment Request

On the basis of discussions with NRC staff, Honeywell decided to modify its initial license amendment request dated March 27, 2009.

Currently the Application for Renewal states:

3.2.6. *Surface Contamination*

For purposes of contamination monitoring and control, areas within the restricted area are designated as follows:
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.*

Surface contamination will be identified by a combination of routine visual observation (not normally documented unless related to a specific unplanned event) and swipe surveys.
The area designations, action levels, and contamination survey frequencies are provided below:

Surface Contamination Control		
Uncontrolled Areas	***Intermediate Areas***	***Controlled Areas***
Removable Contamination Action Level: 200 dpm/100 cm2 (alpha)	*Removable Contamination Action Level: 200 dpm/100 cm2 (alpha)*	*Removable Contamination Action Level: 5,000 dpm/100 cm2 (alpha)*
Survey Frequency: Weekly	*Survey Frequency: Quarterly*	*Survey Frequency: Monthly*

Any area found to exceed the specified action level shall be scheduled for decontamination. Follow-up surveys shall be conducted following decontamination of the area.

To limit the likelihood of personnel intakes of radioactive material within authorized eating areas, Honeywell shall establish written procedures governing required controls, including requirements for individuals to wash their hands before eating or drinking. Honeywell shall reinforce the applicable requirements by establishing conspicuous postings at the entrances to authorized eating areas and through periodic radiation safety training. If contamination at levels exceeding the applicable action level is found in any designated eating area, eating shall be prohibited until completion of decontamination and follow-up surveys.

Honeywell would like to offer the following new version of Section 3.2.6, Surface Contamination, of its Application for Renewal (versus the changes requested in the original amendment application dated March 27, 2009):

3.2.6. Surface Contamination

For purposes of contamination monitoring and control, areas within the restricted area are designated as follows:
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.
Surface contamination will be identified by a combination of routine visual observation (not normally documented unless related to a specific unplanned event) and swipe surveys.
The area designations, action levels, and contamination survey frequencies are provided below:

Surface Contamination Control

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Uncontrolled Areas	Intermediate Areas	Controlled Areas
Removable Contamination Action Level: 200 dpm/100 cm2 (alpha)	Removable Contamination Action Level: 200 dpm/100 cm2 (alpha)	Removable Contamination Action Level: **75,000** dpm/100 cm2 (alpha)
Survey Frequency: Weekly *	Survey Frequency: Quarterly	Survey Frequency: **Weekly**

***Uranium processing area control rooms will be surveyed at a minimum of two times a week.**

Any area found to exceed the specified action level shall be **recorded in the MTW Corrective Action Program and** scheduled for decontamination. **The decontamination effort will begin within 24 hours of notification of the contamination**. Follow-up surveys shall be conducted following decontamination of the area.

To limit the likelihood of personnel intakes of radioactive material within authorized eating areas, Honeywell shall establish written procedures governing required controls, including requirements for individuals to wash their hands before eating or drinking. Honeywell shall reinforce the applicable requirements by establishing conspicuous postings at the entrances to authorized eating areas and through periodic radiation safety training. If contamination at levels exceeding the applicable action level is found in any designated eating area, eating shall be prohibited until completion of decontamination and follow-up surveys.

2. Supplemental Information to Honeywell MTW's License Amendment Request

The updated version of the amendment request (initially submitted on March 27, 2009) intends to clearly demonstrate Honeywell's commitment to improvement of its ALARA program, particularly in the area of contamination management. We would like to specifically address the following contamination control enhancements presented in the proposed Application for Renewal update:

- Increase of the surface contamination action level for Controlled Areas from 5,000 dpm/100cm^2 to 75,000 dpm/100cm^2.

- Increased survey frequency: of the Controlled Area surveys from monthly to weekly; uranium processing area control room surveys from weekly to at least twice weekly.

- Requirement that surface contamination event resulting in contamination survey measurement exceeding 75,000 dpm/100cm^2 be entered into the Corrective Action Program. These events will also be reviewed at periodic ALARA Committee meetings.

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- Decontamination efforts initiation within 24 hours of the notification of the contamination.

The removable contamination action level for the Controlled Area will be changed to 75,000 dpm/100cm^2. This change is a simple acknowledgment of the fact that the action level of 5,000 dpm/100cm^2 currently specified in the license is not consistent with current plant design and not sustainable for long-term operation. We would like to restate that the requested change in the contamination action level (only for the Controlled Area) does not assume any loosening of the plant's contamination control standards. Moreover, a comprehensive package of administrative measures proposed for inclusion in the Application for Renewal (such as increased frequency of contamination surveys, timeliness of decontamination efforts, additional ALARA committee reviews) demonstrates that Honeywell is implementing higher contamination control standards and enhance plant's decontamination practices.

The ALARA Committee will assess the contamination level limits annually and recommend changes when appropriate.

If you have any questions on the provided information or other issues associated with this license amendment application, please contact Mr. Michael Greeno, Regulatory Affairs Manager, at 618-309-5005.

Sincerely,

Mitch Tillman
Plant Manager

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