

Specialty Materials

Honeywell
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November 5, 2009

Certified Mail
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Nuclear Regulatory Commission, Region II
Attn: Jay Henson
Sam Nunn Atlanta Federal Center
61 Forsyth St., S.W. Ste. 23T85
Atlanta, GA 30303

SUBJECT: HONEYWELL REGULATORY COMMITMENT STATUS

Dear Mr. Henson:

This letter is an update on the status of Honeywell's regulatory commitment(s). MTW currently has only one open commitment, LT-28G (see Enclosure I). The facility has made significant progress on commitment LT-28G, Phase II—Procedure Upgrade Project. Out of a total of 204 procedures, 80 have been completed, while 118 procedure revisions are close to being issued.

All of the Nuclear Services "legacy" procedures were reviewed by technical staff to determine appropriate disposition of the material. Additionally, Maintenance and Site Services managers have reviewed their procedures to determine those that are UF₆-related, and thus several procedures were added to the LT-28G list. Many of the lengthy legacy procedures were/are being broken up into individual, upgraded new procedures. However, these actions will require more time and effort in processing the management of change records and other related paperwork on the increased number of procedures.

The following additional actions have also been taken and/or are in progress:

- Procedure Program procedures were enhanced to provide for more expedited procedure handling by the writers and technical authorities.
- Working review meetings continued scrutinizing the procedures line-by-line with applicable operators, engineers, supervisors, and technical writers to ensure appropriate input.
- Checklists are being developed for the detailed steps (which will enhance in-hand compliance), but are very time-consuming to create.
- A concerted effort to improve the training on these more-detailed procedure revisions is being made, ensuring proper documentation of that training. Therefore, completion of the related training has been an additional hindrance in the timely completion of LT-28G for Phase II procedure upgrades.

- It was determined that the format of valve numbers (being incorporated) should be changed to be more in line with the universal Engineering standard.

The aforementioned actions, as well as some additional ones listed below, have caused a further delay in meeting LT-28G projected due date of November 30, 2009:

- Standardization of valve numbers in procedures to match P&IDs, and hanging new valve number tags in the field is a massive effort, which will lengthen processing time for the procedures to be upgraded.
- Increasing amount of training for each procedure revision will increase processing time for procedures.
- Due to major Engineering upgrades to the site facilities/equipment, shutdown activities, etc., additional procedure revisions are required to the same procedures on the LT-28G Project list. This too takes more processing time for the procedures and has delayed our meeting the commitment date.
- Upcoming project work to satisfy deficiencies identified in the MTW Gap Analysis will require more technical authority and procedure writing resources. Additionally, the Gap Analysis identified a shortage in technical authority and writer resources.

In light of the above reasons, we respectfully request an extension to the LT-28G commitment to December 31, 2011.

Let me know if you have any questions/comments or need additional information.
Thank you for your attention and support.

Sincerely,



David Cope
Acting Plant Manager, Metropolis Works
Honeywell International, Inc.

Enclosure

Cc: Nuclear Regulatory Commission, Region II
Attn: John Pelchat
Sam Nunn Atlanta Federal Center
61 Forsyth St., S.W. Ste. 23T85
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M. Greeno
B. Stokes
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Enclosure I

OPEN REGULATORY COMMITMENT

Improvement Area	Item Number	Due Date	Description	Comments
LTIP Procedures & Policies	LT-28G	11/30/09	Improve Technical Procedures: Complete Major Revisions for UF6 Procedures/Policies (Phase II)	Propose extension of this Commitment. New due date: 12/31/2011