

**MATERIALS LICENSE
SUPPLEMENTARY SHEET**License Number
SUB-526Docket or Reference Number
40-3392

Amendment 5

18. The licensee shall conduct authorized activities at the Honeywell Metropolis Works Facility in accordance with the statements, representations and conditions (or as revised by change and/or configuration management processes as described therein) in:
- A. License Application dated May 12, 2006, as supplemented by a letters dated March 20, 2007, and May 12, 2008;
 - B. Safety Demonstration Report dated May 12, 2006;
 - C. Emergency Response Plan (ERP), dated May 27, 2005;
 - D. Integrated Safety Analysis Summary transmitted by letter dated September 30, 2008;
 - E. Site Reclamation Cost Estimate for Metropolis Plant dated January 10, 2007;
 - F. Amendment Request dated December 27, 2006, to possess and use sealed sources;
 - G. Exemption Request dated February 9, 2007, for relief from some of the Decommissioning Funding provisions of 10 CFR 40.64;
 - H. Amendment Request dated July 17, 2008, as supplemented by letters dated October 1, 2008, and December 3, 2008, regarding new process for filling small UF₆ cylinders; and
 - I. Amendment Request dated March 27, 2009, as supplemented by letters dated May 11 and July 21, 2009, regarding changes to the facility's surface contamination levels.
19. Within 180 days of the issuance of the renewed license, all Plant Features and Procedures, to be designated PFAP, shall be developed and implemented within the ISA. The implementation shall include the Configuration Management Program, and Facility Change Process.
20. For changes to the site, structures, processes, systems, components, computer programs, and activities of personnel within the identified plant features and procedures and safety control boundaries that do not require prior NRC approval, Honeywell shall prepare and submit to the NRC, within 30 days after the end of the calendar year in which the change was implemented, a brief summary of all such changes. For all changes that affect the MTW ISA, Honeywell shall submit to the NRC, within 30 days after the end of the calendar year in which the changes were implemented, either a revised ISA summary, or revised ISA summary pages, as appropriate.
21. Honeywell shall, within 10 days of receipt of source material, report to the NMMSS database, the shipper's values of the natural uranium. Shipper's values shall be reported (blocks 1 through 27s of DOE/NRC form 741) as required in Section 2.1.1 of NUREG/BR-0006. To ensure that the values reported are correctly posted, Honeywell shall compare, on a monthly basis, its weights of natural uranium it has received with weight values contained in the NMMSS database, and provide corrections as necessary. The final quantity determination, as agreed upon with the supplier, shall be reported to the NMMSS database within 10 days of the date on which the agreement is finalized.

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2.6.3 Configuration Control

Honeywell shall establish a configuration management system to evaluate, implement, and track each change to the site, structures, processes, systems, components, computer programs, and activities of personnel. This system shall be documented in written procedures and assure that the following issues are identified and addressed prior to implementing a proposed change:

- The technical basis for the change;
- Impact of the change on safety and health and control of licensed material;
- Modifications to existing operating procedures including any necessary training or retraining before implementation of the change;
- Authorization requirements for the change;
- For temporary changes, the approved duration of the change;
- The impact of the change on the facility's documented Integrated Safety Analysis (ISA), Safety Demonstration Report, or other safety program information; and
- Any required changes to the facility's USNRC license.

Honeywell may implement changes to the site, structures, processes, systems, components, computer programs, and activities of personnel without prior approval of the USNRC if the proposed change does not:

- Create new types of accident sequences that, unless mitigated or prevented, would exceed regulatory requirements and that have not previously been described in the ISA; or
- Use new processes, technologies, or control systems for which Honeywell has no prior experience; or
- Remove a Plant Feature or Procedure (PFAP) that is relied on for safety as identified in the MTW ISA, without a replacement PFAP that is at least equivalent; or
- Alter any item relied on for safety, as listed in the MTW ISA, that is the sole item preventing or mitigating an accident sequence that exceeds regulatory requirements; or
- Create any condition or configuration that is otherwise prohibited by this section, license condition, or order.

For changes that require prior USNRC approval, Honeywell shall submit to the USNRC a request for amendment of the license.

For changes that do not require prior USNRC approval, Honeywell shall prepare, within 30 days after the end of the calendar year in which the change was implemented, a brief summary of all changes to the records. For all changes that affect the MTW ISA **Summary**, Honeywell shall submit to the NRC, within 30 days after the end of the

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calendar year in which the changes were implemented, a revised ISA **Summary** or revised ISA **Summary** pages, as appropriate.

For any change approved by Honeywell for implementation, Honeywell shall promptly update affected site documentation (e.g., policies, procedures, drawings, and training materials).

Honeywell shall maintain records of changes to the facility carried out under this section for no less than five years following implementation of the change. These records shall include the written evaluation that provides the bases for the determination that the changes do not require prior USNRC approval.

Within ninety days of issuance of the revised USNRC license, Honeywell shall identify those procedures that are considered PFAP, as necessary to support the MTW ISA, and update the ISA **Summary** accordingly to reflect these procedures. The affected procedures shall include procedures that address operator attentiveness, overtime, and procedural compliance.

2.6.3.1 Changes to the License Application

Changes Requiring Prior Approval

Honeywell shall not make changes to the License Application that decrease the effectiveness of commitments, without prior USNRC approval. For these changes, Honeywell will submit to the USNRC, for review and approval, an application to amend the license. Such changes will not be implemented until approval is granted.

Changes Not Requiring Prior Approval

Upon documented completion of a request for change to the facility or process, Honeywell may make changes to the facility or process as presented in the License Application, or conduct test or activities not presented in the License Application, without prior USNRC approval, subject to the following conditions:

- **There is no degradation in the safety commitments in the License Application;**
- **The change, test, or activity does not conflict with any condition specifically stated in the License.**

Records of changes, carried out under this section, including technical justification and management approval, will be maintained as required by Honeywell's document management and control policies. A report containing a description of each such change, and a revised License Application or revised License Application pages, as appropriate, shall be submitted to the USNRC within 30 days after the end of the calendar year in which the changes were implemented.

2.6.3.2 Safety Demonstration Report

The Safety Demonstration Report, submitted separately, contains safety information and descriptive information that demonstrates Honeywell's adherence to the conditions established in the Source Materials License Renewal Application.

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The Safety Demonstration Report is not part of the license application, but provides information that supports the license application.

The Safety Demonstration Report is a living document that will be updated as necessary to reflect changes to the facility or procedures. Written procedures shall establish the methods for updating the Safety Demonstration Report. Any change to the Safety Demonstration Report that may reduce the level of safety shall require prior approval of the USNRC. Changes that do not reduce the level of safety may be made without prior USNRC approval.

2.6.3.3 Changes to Other Licensing Basis Documents

Honeywell can make changes to its other licensing basis documents as specified in the following regulations:

- Emergency Response Plan (ERP) – 10 CFR 40.35(f);**
- Decommissioning Cost Estimate – 10 CFR 40.36(d);**

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8. Other Submittals

8.1 Interim Compensatory Measures

Honeywell's Interim Compensatory Measures have been incorporated by reference into this license renewal application. Because the Interim Compensatory Measures contain Safeguards Information, they have been provided to the NRC under separate cover.

8.2 Section 8.2, Safety Demonstration Report, will be moved (without any text changes) to Section 2.6.3 of this document.