

Specialty Materials

Honeywell
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July 12, 2010

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Attention: Document Control Desk
Director, Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

References: 1) Docket No. 40-3392; SUB License 526

Subject: Amendment Application to Modify License Condition 18 of Source Material License SUB-526

Pursuant to the requirements set forth by 10 CFR 40.44, Honeywell Metropolis Works hereby submits the following request for amendment to revise License Condition 18 of SUB-526. The current LC-18 states:

- 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 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.*

NM5501

The proposed License Condition 18 includes Item J which is the planned revision to the SUB-526 License Application Section 2.6.3 and Chapter 8, describing the configuration control process. The License Application pages containing this revision are included as an attachment. No other changes have been made. License Condition 18 shall read as follows:

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 letters dated March 20, 2007, May 12, 2008, **and July 12, 2010**;
 - 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;
 - J. **Amendment Request dated July 12, 2010, regarding process description of the facility's configuration control system.**

If you or your staff have any questions, require further information, or wish to discuss this please contact Mr. Michael Greeno, Regulatory Affairs Manager, at 618-309-5005.

Sincerely,



Mr. Larry A. Smith
Plant Manager

Attachment

cc: US Nuclear Regulatory Commission
Attention: Tilda Liu, NMSS Project Manager,
Mail Stop EBB 2-C40M
11555 Rockville Pike
Rockville, MD 20852

Michael Greeno, Bob Stokes, Lidia Litinski

Attachment

Revision to SUB-526 License Application Sections 2.6.3 and Chapter 8

4 pages to follow

2.6.3. Configuration Control

Honeywell shall establish a configuration management system to evaluate, implement, and track all proposed changes to the site, structures, processes, systems, components, computer programs, and activities of personnel. This system shall be documented in approved written procedures.

The Management of Change process is outlined below:

- A. Proposed change request is initiated and submitted addressing the following criteria:
 - 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;
- B. Tiered review of the proposed change package is performed by management (If necessary, a Process Hazard Analysis (PHA) is conducted with any recommendations from the PHA included within the scope of the field work package);
- C. Review is conducted to determine if the change requires NRC approval (This review contains provisions to evaluate and resolve potentially inadequate safety analyses);
 - i. Honeywell MTW 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 regulation, license condition, or order.
- ii. Proposed changes not meeting all of the above criteria shall be deemed to require USNRC approval by amendment. The amendment will be submitted pursuant to the requirements of 10 CFR 40.44. As part of the application for amendment, Honeywell MTW shall perform a review of the safety basis for the change and submit a summary of the review determination if applicable.

D. If appropriate, a pre-startup safety review is conducted and the field work is inspected by the Engineering, Health, Safety, and Environmental, Health Physics, Operations, and Maintenance Departments;

Proposed changes to Licensing Basis Documents listed in License Condition 18 shall also be evaluated in accordance with the Honeywell MTW Management of Change process and as specified in the following regulations:

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

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 within the identified plant features and procedures and safety control boundaries. 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, 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 in accordance with internal document management and control policies. 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 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. 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.

2.6.3.2 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 USNRC under separate cover.

8. Other Submittals

DELETED: Entire Chapter moved to Section 2.6.3