

Specialty Materials

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December 14, 2010

Certified Mail: 7009 1410 0001 3772 3216

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; License SUB-526
 2. Public Meeting with Honeywell International, Inc. to Discuss Upcoming Licensing Action Related to Honeywell Metropolis Works' Pond Closure Plan and Associated Decommissioning Activities dated October 5, 2010 (ML102640573)
 3. Letter from Larry Smith, Plant Manager Honeywell to NRC, Surface Impoundment Decommissioning Plan, dated December 2, 2010

Subject: Review Schedule for Surface Impoundment Decommissioning Plan

On December 2, 2010, Honeywell submitted a decommissioning plan related to closure of existing surface impoundments at the Metropolis Works facility. In that submittal, Honeywell did not specify an anticipated date for completion of the NRC review. During the public meeting held on October 5, 2010, to discuss the decommissioning plan, the NRC had indicated that a one-year review was achievable. Based on subsequent discussions with the NRC Staff, it now appears that the NRC may classify the proposal as a "complex" review, which would result in a 540-day review schedule and a target completion date of May 26, 2012.

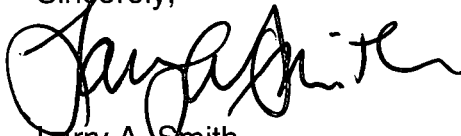
Honeywell continues to believe that a one-year review period is appropriate under the circumstances, resulting in a final decision by the end of calendar year 2011. Honeywell has separately submitted a RCRA Class 3 Permit Modification Request and Closure Plan to the Illinois Environmental Protection Agency (IEPA). The IEPA review of the application is expected to last approximately 12 months. In order to facilitate effective coordination among responsible agencies and ensure timely completion of surface impoundment closure/decommissioning, Honeywell believes that the two regulatory reviews should proceed roughly in parallel. Absent such coordination, there is a risk that changes to one application would necessitate changes in the other, resulting in multiple reviews and inefficient use of NRC, IEPA, and Honeywell resources.

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In addition, the NRC's acceptance review is ongoing and it may not be necessary to categorize the NRC's review as "complex." The proposed decommissioning addresses only a small portion of the overall site and is also subject to IEPA RCRA closure requirements. From a radiological perspective, the decommissioning plan involves relatively small amounts of radiological materials within a controlled location (*i.e.*, existing surface impoundments permitted by IEPA), no groundwater impacts, and low projected doses. Honeywell also anticipates that the environmental review will require an Environmental Assessment rather than a full Environmental Impact Statement. For these reasons, a one-year review schedule is requested.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Larry A. Smith". The signature is fluid and cursive, with a large initial "L" and "S".

Larry A. Smith
Plant Manager

cc:

Tilda Liu, NMSS Project Manager
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Mr. Michael Greeno
Ms. Lidia Litinski