

Specialty Materials

Honeywell
P.O. Box 430
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Metropolis, IL 62960

December 14, 2010

Certified Mail: 7009 1410 0001 3772 3223

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: Request to Withhold from Public Disclosure

In accordance with 10 CFR 2.390, Honeywell Metropolis Works hereby requests the following pages from the decommissioning plan submitted on December 2, 2010 (Reference 3) be withheld from public disclosure.

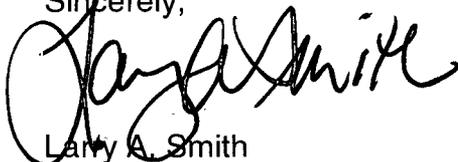
All pages which were stamped with the words "Public Record Claimed Exempt" in red.

All drawings which are labeled with these words are categorized as Sensitive Unclassified Non-Safeguards Information (SUNSI).

Table D-1, Appendix D *Closure Implementation Cost Estimate* of Appendix V of the submittal is categorized as proprietary financial information.

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,



Larry A. Smith
Plant Manager

Enclosure

NMSSDI

cc:

Tilda Liu, NMSS Project Manager
Mail Stop EBB 2-C40M
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Mr. Kevin Mattern, NMSS Project Manager
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Mr. Michael Greeno
Ms. Lidia Litinski

**AFFADAVIT
TRADE SECRET OR COMMERCIAL INFORMATION**

I, Larry A. Smith, Plant Manager at Honeywell Metropolis Works (MTW), certify that to the best of my knowledge and beliefs (and in reliance on the Contractor provided information, as applicable), make the following representation contained herein:

- A. The following documents(s) which Honeywell Metropolis Works wishes to have withheld from public disclosure are:

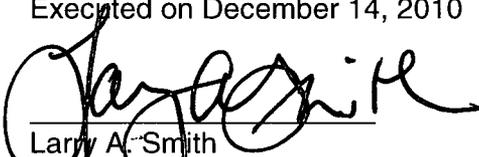
Pages included within the Surface Impoundment Decommissioning Plan submittal dated December 2, 2010 which are stamped with the words "Public Record Claimed Exempt"

- B. The information contained in the document(s) cited in A above has been held in confidence by Honeywell Metropolis Works, or its Contractor, in that it contains trade secrets or commercial information as specified in Title 10, Code of Federal Regulations, Part 2.390(a). The basis for requesting that this document(s) be withheld from public disclosure is explicitly marked on the cover page to each of the aforementioned documents and/or on each affected page in accordance with 10 CFR 2.390(b)(i)(B).
- C. The information contained in the document(s) cited in A above is the intellectual property of Honeywell Metropolis Works, or its Contractor, and as such is customarily held in confidence by Honeywell Metropolis Works. As such, Honeywell Metropolis Works has customarily submitted privileged and confidential information of this type to the Nuclear Regulatory Commission (NRC) and to its predecessor, the Atomic Energy Commission (AEC), in confidence.
- D. The information contained in the document(s) cited in A above has not been made available to public sources by Honeywell Metropolis Works, nor has Honeywell Metropolis Works authorized that it be made available. In accordance with Honeywell Metropolis Works policies governing the protection and control of information, proprietary information contained herein has been made available, on a limited basis, to others outside Honeywell Metropolis Works only as required under suitable agreement providing for nondisclosure and limited use of the information.
- E. The public disclosure of the information contained in the document(s) cited in A above is likely to cause substantial economic harm to the competitive advantage held by Honeywell Metropolis Works, or its Contractor. The basis for withholding said information is that it contains distinguishing aspects of a process, methodology, or component(s), including costs, the exclusive use of which provides a competitive advantage for Honeywell Metropolis Works or its Contractor in product optimization or marketability.
- F. The proprietary information that Honeywell Metropolis Works requests to be withheld from public disclosure is contained in the specific page(s) as so marked.

For all of the reasons discussed above, Honeywell requests that this proprietary information be withheld from public disclosure.

I declare under penalty of perjury that the foregoing is true and correct

Executed on December 14, 2010



Larry A. Smith
Plant Manager