

Specialty Materials

Honeywell
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December 14, 2010

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ATTN: Document Control Desk
Director, Office of Nuclear Material Safety Safeguards
US Nuclear Regulatory Commission
Washington, DC 20555-0001

Docket No. 40-3392
License No. SUB-526

RE: REPLY TO A NOTICE OF VIOLATION
NRC INSPECTION REPORT 40-3392/2010-006 AND NOTICE OF VIOLATION

Dear Sirs:

This letter is Honeywell Metropolis Works response to the NRC Inspection Report 40-3392/2010-006 and Notice of Violation Dated November 15, 2010.

During the NRC inspection conducted on October 18-21, 2010, a violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below:

License Condition 18 of NRC License SUB-526 states, in part, that the licensee shall conduct authorized activities at the Honeywell Metropolis Works Facility in accordance with the statements, representations and conditions of the Emergency Response Plan.

Section 4.3 of the Honeywell Emergency Response Plan requires, in part, that "Press releases that result from local plant activities or conditions are drafted by the Plant Manager or his designee." Additionally, Honeywell Emergency procedure EPIP-008 Objective 2.11 states "Develop, review, approve and issue press release(s) accurately describing conditions and protective and corrective actions."

Contrary to the Honeywell Emergency Response Plan the Plant Manager or his designee did not draft the press release. The press release was drafted by Honeywell corporate media personnel in Morristown, New Jersey, and distributed without being reviewed by Honeywell Metropolis personnel. This press release was incorrect in that it specified the wrong emergency classification and that there were no reports of releases.

This violation is a Severity Level IV violation (Supplement 6.2).

Reason for the Violation:

There was a communication failure between the Crisis Manager in Metropolis and the Honeywell corporate reviewer in Morristown, NJ. The information from Metropolis should

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have been provided to the corporate reviewer and then validated in Metropolis prior to release.

Corrective Steps that Have Been Taken and the Results Achieved:

The drill report has been completed and issued. A corrective action has been entered into the corrective action program to improve communication and press release capability. Completed on 10/20/2010.

Corrective Steps that Will Be Taken to Avoid Further Violations:

Training will be developed and given to the Crisis Managers and the Corporate Media personnel who will support accurate and timely communications with the public and media. Target Date: 1/30/2011.

Date When Full Compliance Will Be Achieved:

Full compliance with the License Condition 18 of NRC License SUB-526, Section 4.3 of the Honeywell Emergency Response Plan, and Honeywell Emergency procedure EPIP-008 Objective 2.11 will be achieved by 1/30/2011.

If you have questions, need additional information, or wish to discuss this matter, please contact Mr. Michael Greeno, Regulatory Affairs Manager, at 618-309-5005.

Sincerely,



Larry A. Smith
Plant Manager

cc: Regional Administrator
Region II, US Nuclear Regulatory Commission
245 Peachtree Center Ave., NE, Suite 1200
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Region II, US Nuclear Regulatory Commission
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