

February 10, 2011

Mr. Larry Smith  
Plant Manager  
Honeywell Metropolis Works  
P.O. Box 430, Highway 45 North  
Metropolis, IL 62960

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION REGARDING CHANGES TO  
LICENSE CONDITION 18 HONEYWELL METROPOLIS WORKS (TAC  
NO. L32758)

Dear Mr. Smith:

By letter dated July 12, 2010 (Agencywide Documents Access and Management System [ADAMS] Accession Number ML102030260), Honeywell Metropolis Works provided its amendment application to modify license Condition (LC) 18 of source material license SUB-526. LC-18 was imposed by the U.S. Nuclear Regulatory Commission (NRC) to provide additional regulatory basis for the Honeywell Metropolis Works material license by delineating the licensing basis documents and associated amendments. The NRC staff is reviewing the information contained in Honeywell's submittal and has identified areas where additional information is needed to complete the review. The enclosure to this letter contains the staff's specific requests for additional information (RAIs) needed to conduct a detailed review. The RAIs were discussed with Mike Greeno of your staff on February 8, 2011, via teleconference.

In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR), Part 2.390 of the NRC's Rules of Practice, a copy of this letter will be available electronically from the Publicly Available Records component of ADAMS. ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

As discussed in the February 8, 2011 teleconference (ML110400045), Honeywell has committed to provide its formal response to this letter by February 15, 2011. If there are any unforeseen circumstances which might delay the RAI response, or any questions regarding this action, please contact me at (301) 492-3221, or via e-mail at [kevin.mattern@nrc.gov](mailto:kevin.mattern@nrc.gov).

Sincerely,

*/RA/*

Kevin S. Mattern, Project Manager  
Advanced Fuel Cycle, Enrichment,  
and Uranium Conversion Branch  
Division of Fuel Cycle Safety  
and Safeguards  
Office of Nuclear Material Safety  
and Safeguards

Enclosure: As stated

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

February 10, 2011

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Sincerely,

***/RA/***

Kevin S. Mattern, Project Manager  
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Enclosure: As stated

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

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### **Requests for Additional Information**

1. Justify the application of the configuration management process to all of the documents under License Condition (LC) 18. Explain why documents other than A, B, and D should be appropriately handled by this process.
2. Explain what would prohibit using Honeywell's "Management of Change" process to change or modify the provisions under 2.6.3, "Configuration Control." Clarify which criteria would preclude this inappropriate action.
3. The evaluation of the change must determine, before the change is implemented, if an amendment to the license is required. It may be possible to meet the proposed criteria in 2.6.3, yet still require a license amendment. Describe the way in which Honeywell's process accounts for this discrepancy and ensures compliance with 10 CFR 40.9, 40.35, 40.36, 40.42 and 40.44.
4. With the addition of a specific reference under LC-18 to configuration management, explain why the wording "or as revised by change and/or configuration management process as described therein" is needed. Discuss whether there are other change processes, not codified in regulation that Honeywell utilizes.