February 10, 2011

MEMORANDUM TO: Thomas G. Hiltz, Chief
Advanced Fuel Cycle, Enrichment,
and Uranium Conversion Branch
Special Projects and Technical
Support Directorate
Division of Fuel Cycle Safety
and Safeguards
Office of Nuclear Material Safety
and Safeguards

FROM: Kevin S. Mattern, Project Manager ***/RA/***
Advanced Fuel Cycle, Enrichment,
and Uranium Conversion Branch
Special Projects and Technical
Support Directorate
Division of Fuel Cycle Safety
and Safeguards
Office of Nuclear Material Safety
and Safeguards

SUBJECT: FEBRUARY 8, 2011, TELEPHONE CONFERENCE SUMMARY REGARDING HONEYWELL'S AMENDMENT REQUEST TO MODIFY LICENSE CONDITION 18 (TAC NO. L32758)

The U.S. Nuclear Regulatory Commission's (NRC's) staff and representatives of Honeywell International held a telephone conference on February 8, 2011, to discuss the staff's draft requests for additional information (DRAIs) concerning the July 12, 2010, submittal (Agencywide Documents Access and Management System [ADAMS] Accession No. ML102030260) provided by Honeywell regarding an amendment request to modify License Condition 18 of Materials License SUB-526.

While no regulatory decisions were made during the telephone conference, the call was useful in clarifying the intent of the staff's DRAIs. Each DRAI was examined and discussed in detail to ensure that Honeywell was in complete understanding of the basis and purpose. Honeywell stated that the call was effective, that it had a clear understanding of each DRAI, and that it would develop formal RAI responses, to be provided to the NRC via letter on or before February 15, 2010. Honeywell indicated that it would submit any revised licensing document pages that may be modified as a result of formulating its RAI responses.

CONTACT: Kevin Mattern, NMSS/FCSS/AFCB
(301) 492-3221

Enclosure 1 provides a list of those who participated in the telephone conference. Enclosure 2 contains a listing of the DRAIs that the staff provided to Honeywell, via e-mail, on February 1, 2011, which will become formal RAIs to be sent in a forthcoming letter.

Honeywell has had an opportunity to review and comment on this summary.

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

Enclosures:
As stated

cc: Mr. Michael Greeno
Nuclear Regulatory Affairs Manager
Honeywell Metropolis Works
2768 North US 45 Road
P.O. Box 430
Metropolis, IL 62960

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NAME	KMattern	LAllen	TLiu	THiltz
DATE	02/ 09 /2011	02/ 09 /2011	02/ 09 /2011	02/ 10 /2011

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LIST OF PARTICIPANTS FOR TELEPHONE CONFERENCE TO ADDRESS NRC STAFF DRAFT REQUESTS FOR ADDITIONAL INFORMATION

Regarding Amendment to Modify License Condition 18

Honeywell

Metropolis Works Facility

February 8, 2011

NAME	AFFILIATION
Tilda Liu	U.S. Nuclear Regulatory Commission (NRC)
Kevin Mattern	NRC
Michael Greeno	Honeywell
Dallas Gardner	Honeywell
Lidia Litinski	Honeywell

Enclosure

Draft Requests for Additional Information (DRAIs)

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.