Specialty Materials
Honeywell
P.O. Box 430
2768 North US 45 Road
Metropolis, IL 62960

March 4, 2011

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.
4) E-mail from the NRC to Michael Greeno, Regulatory Affairs Manager Honeywell, Non-Acceptance of Review – Honeywell Metropolis Works Surface Impoundment Decommissioning Plan, dated February 11, 2011.
5) Conference call conducted Wednesday, February 23, 2011 between the NRC and Honeywell.
6) Letter from Larry Smith, Plant Manager Honeywell to NRC, Supplemental Information for the Surface Impoundment Decommissioning Plan Application, dated February 25, 2011.

Subject: Additional Supplemental Information for the Surface Impoundment Decommissioning Plan Application

As stated in Reference 6, Honeywell Metropolis Works hereby submits information to further supplement the Surface Impoundment Decommissioning Plan dated December 2, 2010 (Reference 3). This information is included as an attachment to this letter.

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

Attachment

NMSS01

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
Mail Stop EBB 2-C40M
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Mr. Michael Greeno
Ms. Lidia Litinski

Attachment 1

Additional Supplemental Information Required for the NRC Detailed Technical Review

6 pages to follow

Enclosed CD contains the following files:

File Name	File Size (Bytes)	File Date
1Q2006 Part B GW Report.pdf	2835298	3/2/2011
1Q2007 Part B GW Radium.PDF	1524404	3/2/2011
1Q2007 Part B GW Report.PDF	3103049	3/2/2011
1Q2007 Part B GW Resample.PDF	3203041	3/2/2011
1stQtr08 Part B GW Review 041508.pdf	3689159	3/2/2011
1stQtr09 Part B GW 2 23 09.pdf	335755	3/2/2011
1stQtr10 Part B GW Confirmed 3-19-10.pdf	280774	3/2/2011
1stQtr10 Part B GW Review 3-12-10.pdf	2434070	3/2/2011
2ndQtr08 Part B GW (07-14-08).pdf	4582714	3/2/2011
2ndQtr08 Part B GW Confirmed 8-4-08.pdf	318477	3/2/2011
2ndQtr09 Part B GW (6-29-09).pdf	1698535	3/2/2011
2ndQtr10 Part B GW (6-29-10).pdf	948269	3/2/2011
2ndQtr10 Part B GW-confirmed (7-6-2010).pdf	1090594	3/2/2011
2Q2006 Part B GW Radium.PDF	2777273	3/2/2011
2Q2006 Part B GW Report.PDF	4218888	3/2/2011
2Q2006 Part B GW Resample.PDF	3103017	3/2/2011
2Q2007 Part B GW Report 2.PDF	3961871	3/2/2011
2Q2007 Part B GW Report.PDF	2957298	3/2/2011
3Q2006 Part B GW Report.PDF	4901029	3/2/2011
3Q2006 Part B GW Resample.PDF	1920554	3/2/2011
3Q2007 Part B GW Radium.PDF	393809	3/2/2011
3Q2007 Part B GW Report.PDF	5134586	3/2/2011
3rdQtr08 Part B GW (10-14-08).pdf	2500531	3/2/2011
3rdQtr09 Part B GW (8-18-09).pdf	861786	3/2/2011
3rdQtr09 RCRA Part B Confirmed GWM 9-11-09.pdf	229014	3/2/2011
3rdQtr10 Part B GW (8-13-10).pdf	1951125	3/2/2011
3rdQtr10 Part B GW Radium 226 (1-27-11).pdf	398225	3/2/2011
4Q2006 Part B GW Report.pdf	5016044	3/2/2011
4Q2007 Part B GW Report.PDF	2847917	3/2/2011
4th Qtr 08 RCRA Part B Permit GW Monitoring Review (1-14-09).pdf	481755	3/2/2011
4thQ10 PartBGW confirmed (11-29-10).pdf	288200	3/2/2011
4thQtr09 Part B GW - Confirmed (1-13-10).pdf	266218	3/2/2011
4thQtr09 RCRA Part B GWM Review 12-8-09.pdf	472721	3/2/2011
4thQtr10 Part B GW (12-7-10).pdf	2132703	3/2/2011
4thQtr10 Part B GW radium (12-7-10).pdf	1974250	3/2/2011

Supplemental Information on Item 2.e

In a Letter from Larry Smith, Plant Manager Honeywell to NRC, Supplemental Information for the Surface Impoundment Decommissioning Plan Application, dated February 25, 2011 (Reference 6), Honeywell provided supplemental information required for the NRC Detailed Technical Review Item 2.e., Rock Durability Analysis. Specifically, Honeywell committed to select and evaluate riprap source material based on rock durability testing/scoring, absence of adverse minerals and heterogeneities, and evidence of resistance to weathering (per NUREG-1623, Appendix D and NUREG-1757, Appendix P). In the February 25, 2011, letter, Honeywell did not provide a specific date by which it would submit the results of that evaluation. Honeywell intends to provide the NRC with the results of its riprap selection and evaluation in the first quarter of 2012.

NUREG 1757, Volume 1, Appendix D, Section XIII (Quality Assurance Program)

Following is a comparison of the requirements in NUREG-1757, Volume 1, Appendix D, Section XIII (Quality Assurance Program) to the information previously submitted in Appendix U of the Decommissioning Plan along with additional supporting information and details regarding future information submittal.

XIII.a. Organization

Section 2 of the RCRA Pond Closure Construction Quality Assurance (CQA) Plan provides a description of the CQA Officer. Additional information regarding the QA organization is provided below.

The ultimate responsibility for implementing the elements of the Decommissioning QA Program rests with the Decommissioning Project Manager. The responsibilities of the Decommissioning Project Manager will include, but are not limited to, the following:

1) Establish the procedures to partially decommission the site and submit changes to the decommissioning plan to the NRC. The Decommissioning Project Manager may not implement the changes until approved by the NRC in writing;

2) Assure that the capability of radiation protection services are sufficient to meet the requirements of this decommissioning plan and applicable state or federal regulations;

3) Designate the CQA Officer as a direct report with respect to the Quality Assurance Project Plan (QAPP).

The CQA Officer will be independent from operations, engineering, and procurement. This position may be a collateral function of another manager, provided that manager is not responsible for operations, engineering, or procurement. For example, the CQA Officer may be the same person as the existing MTW Quality Assurance Supervisor, who already has responsibility for licensed QA activities at the MTW, as specified in current licensing documents. The CQA Officer will be responsible for recommending the type and quantity of staff and resources necessary for full implementation of the QAPP. The CQA Officer will report to the Decommissioning Project Manager to ensure that required authority and organizational freedom are provided. The CQA Officer will have the responsibility and authority to terminate any work activities that do or may violate regulatory or Honeywell Metropolis Works (MTW) requirements. Specific work activities will be permitted to proceed to a safe condition after implementation of the stop-work order. Stop-work orders will be lifted after the initiating conditions have been alleviated.

QA Staff may be assigned to the CQA Officer on a permanent or temporary basis. Staffing level will be recommended by the CQA Officer and approved by the Decommissioning Project Manager. Up-to-date information will be provided prior to decommissioning implementation. The QA staff is responsible for ensuring that the quality assurance requirements verifying that activities affecting quality have been correctly performed will have sufficient authority, access to work areas, and organizational freedom to:

1) Identify quality problems

2) Initiate, recommend or provide solutions to quality problems through designated channels

3) Verify implementation of solutions

4) Ensure that further decommissioning activities are controlled until proper disposition of a nonconformance or deficiency has occurred

Up-to-date information will be provided prior to decommissioning implementation.

XIII.b. Quality Assurance Program

For execution of decommissioning activities, a QAPP, consistent with applicable guidelines will be developed. The QAPP will be reviewed and approved by MTW prior to its implementation to ensure all programmatic elements are consistent with regulatory, licensing, and other QAPP requirements. The QAPP will ensure collection of reliable data by serving as the instrument of control for field and analytical activities associated with the project. Stated within the QAPP are the quality assurance policies, quality control criteria, and reporting requirements that must be followed by all site and contractor personnel when carrying out their assigned responsibilities. The QAPP will describe the functional activities and quality assurance/quality control protocols necessary to collect data of adequate quality.

The approved QAPP will also address the following topics:

1) Discussion of instruction provided to personnel responsible for performing activities affecting quality pertaining to the purpose, scope, and implementation for the quality-related manuals, instructions, and procedures

2) Description of training and qualifications of personnel verifying activities affecting quality in the principles, techniques, and requirements of the activity being performed

3) Formal training and qualification programs which will include documentation of attendees, date of attendance, and objectives and content of program

4) Description of the self-assessment program for confirming that activities affecting quality comply with the QAPP, including independence of the assessors from the activities they are assessing

5) Description of the organization responsibilities for ensuring that activities affecting quality are prescribed in appropriate procedures and accomplished through implementation of these procedures

6) Description of how the licensee develops, issues, revises and retires QA documents

Section 6 of the CQA Plan provides information regarding documentation requirements. A summary of QA policies and provisions to ensure that technical and quality assurance procedures required to implement the QAPP are consistent with regulatory, licensing, and QAPP requirements and are properly documented and controlled will be provided to the NRC before the start of the on-site effort.

The effectiveness of the QAPP will be periodically evaluated by the Decommissioning Project Manager. This evaluation will include the scope of the program, status of audits and surveillances, adequacy of the program, and compliance of the QAPP. The CQA Officer will meet with the Decommissioning Project Manager once each calendar quarter in order to perform this evaluation. Section 2 of the CQA Plan provides a description of the role of the CQA Officer with regards to the CQA Plan and evaluation of work performance.

Section 5 of the CQA Plan establishes contractor responsibilities. In addition, supporting Quality Implementing Procedures (QIPs) will provide step-by-step details for complying with project QA requirements. The final radiological survey, including development of sampling plans, direct measurements, sample analysis, instrument calibration, daily functional checks of instruments, and sampling methods will be performed according to written procedures. These written procedures will be reviewed and approved by the Decommissioning Project Manager.

Up-to-date information will be provided prior to decommissioning implementation. The QAPP will be provided to the NRC for review and acceptance before implementation. Changes to the QAPP would be made in accordance with existing site requirements, including MTW License Application Section 2.6.3, "Configuration Control," and implementing procedures.

XIII.c. Document Control

Section 6 of the CQA Plan provides a discussion of QA documentation requirements. Additional information is provided below.

In general, QA documents are those documents necessary to demonstrate compliance with NRC requirements and license commitments. QA documents include a variety of radiation protection and radiation safety procedures. QA documents are handled in accordance with Section 2.9 of the MTW License Application. Data will be recorded and documented in a data management system. Entries will include the location of the surveyor sampling point on the appropriate impoundment grid. Data management personnel will also ensure that chain-of-custody and data management procedures are followed for decommissioning-related samples. The decommissioning contractor's procedures for proper handling, shipping and storage of samples will be used. Both direct measurements and analytical results will be documented. The results for each survey measurement or sample and its grid block location, will be listed in tabular form (i.e., result versus sample or survey location). Data will be recorded in an orderly and verifiable way and reviewed for accuracy and consistency. Each step of the decommissioning process, from training personnel to calculating and interpreting the data, will be

documented in a way that lends itself to audit. Records of training to demonstrate qualification will also be maintained.

MTW will retain QA documents at the site during decommissioning activities. At the conclusion of decommissioning, such decommissioning documents will be stored and available for retrieval for use in other decommissioning activities.

XIII.d. Control of Measuring and Test Equipment

Radiation detection and monitoring equipment are calibrated and maintained as described in the site Health Physics program. Per MTW License Application Section 3.2.4, portable radiological monitoring instruments calibrations shall be conducted in accordance with Section 8 of Regulatory Guide 8.30 using radioactive sources traceable to the National Institutes of Standards and Technology (NIST). Proper maintenance of equipment varies, but maintenance information and use limitations are provided in the vendor documentation.

Measurement and analysis equipment will be tested and calibrated before initial use and will be recalibrated if maintenance or modifications could invalidate earlier calibrations. Field and laboratory equipment, specifically those used for obtaining final radiological survey data, will be calibrated and maintained as described in the site Health Physics program. Minimum frequencies for calibrating equipment are described in Section 3, Table 3-1, of the License Application. Measurement equipment will be tested at least once on each day the equipment is used.

Test results will be recorded in tabular or graphic form and compared to predetermined, acceptable performance ranges. Equipment that does not conform to the performance criteria will be promptly removed from service until the deficiencies can be resolved.

XIII.e. Corrective Action

Deficiencies and conditions that do not conform to the Decommissioning Plan, project procedures, or NRC license will be corrected using a corrective action program. Sections 2.7 and 2.8 of the License Application, as well as MTW-ADM-QA-0110 (when effective, MTW-ADM-REG-0110), "Corrective Action Program," provide additional information regarding the site corrective action program. The CQA Officer has overall responsibility for reporting all procedure and contract violations found. All personnel assigned to the Decommissioning Contractor are encouraged to identify nonconforming conditions and report them to their supervisor and/or the CQA Officer. In addition, audits and surveillances will be conducted during the course of the decommissioning project in accordance with MTW site procedure MTW-ADM-QA-0160, "Performance of Internal Audits, Self-Assessments, and Inspections." Observations will be investigated and corrections will be made as necessary. Significant conditions adverse to quality, the cause of the conditions, and the corrective action(s) taken to preclude repetition

will be documented and reported to immediate management and upper levels of management for review and assessment.

XIII.f. Quality Assurance Records

QA records are those records required to demonstrate compliance with NRC requirements and license commitments. These records will be maintained by individuals designated by the Decommissioning Project Manager and in accordance with Section 2.9 of the MTW License Application. QA records will be retained at the MTW site for the duration of decommissioning activities. On site records for decommissioning activities will be handled in accordance with MTW procedures for records storage and handling.

Sections 2, 6, and 18 of the CQA Plan provide a partial description of the role of the CQA Officer regarding documentation control and Quality Assurance Records.

XIII.g. Audits and Surveillances

Audits and surveillances will be conducted during the course of the decommissioning project. Audits and assessments of site decommissioning activities will be conducted in accordance with MTW site procedure MTW-ADM-QA-0160, "Performance of Internal Audits, Self-Assessments, and Inspections." Audit information will become part of the decommissioning record for the site.