

September 15, 2011

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	
HONEYWELL INTERNATIONAL INC.)	Docket No. 40-3392
)	
(Metropolis Works Uranium)	ASLBP No. 11-910-01-MLA-BD01
Conversion Facility))	

Dear Administrative Judges:

Consistent with its obligations under 10 C.F.R. §§ 2.336 and 2.1203, as modified by the Board's August 23, 2011 Order adopting the disclosure provisions of the parties' Joint Filing on Administrative Issues,¹ the Nuclear Regulatory Commission (NRC) Staff provides the Licensing Board and the parties with the attached index listing documents required to be disclosed by the Staff. Along with this index, the Staff is providing an affidavit certifying that it has disclosed all relevant documents.

Respectfully submitted,

*/Signed (electronically) by/
Patricia Jehle*

Michael J. Clark
Patricia A. Jehle
Emily L. Monteith
Counsel for NRC Staff

Attachments: NRC Staff's Disclosure Index
Affidavit of Thomas Hiltz

cc: Electronic Information Exchange Service List

¹ Initial Scheduling Order (August 23, 2011) at 4; Joint Filing on Administrative Issues (August 18, 2011) (ADAMS Accession No. ML11230A099) at 1-2.

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Honeywell International Inc. (Metropolis Works Uranium Conversion Facility)
Docket No. 40-3392; ASLBP No. 11-910-01-MLA-BD01

NRC Staff's Disclosures

Document Number	ADAMS Accession Number (if applicable)	Document Date	Title and Location (if not in ADAMS)
NRC-001		April 7, 1982	Revised Interim Final Rules; Standards Applicable to Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities; Financial Requirements, 47 Fed. Reg. 15,032 (Env't'l Prot. Agency April 7, 1982)
NRC-002		June 27, 1988	Final Rule; General Requirements for Decommissioning Nuclear Facilities, 53 Fed. Reg. 24,018 (June 27, 1988)
NRC-003		December 29, 1993	Final Rule; Self-Guarantee as an Additional Financial Assurance Mechanism, 58 Fed. Reg. 68,726 (December 29 1993)
NRC-004	ML031840560	August 5, 1997	NMSS Policy and Procedures Letter 1-58, Processing of Exemptions for Material Licensees and Certificate Holders (Aug. 5, 1997)
NRC-005		December 2000	U.S. Nuclear Regulatory Commission, NUREG-1556, Vol. 20, Guidance About Administrative Licensing Procedures (Dec. 2000) http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v20/sr1556v20.pdf
NRC-006		September 2003	U.S. Nuclear Regulatory Commission, NUREG-1757, Vol. 3, Financial Assurance, Recordkeeping, and Timeliness (Sept. 2003) http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1757/v3/sr1757v3.pdf
NRC-007		January 22, 2008	Proposed Rule; Decommissioning Planning, 73 Fed. Reg. 3812 (January 22, 2008)
NRC-008	ML082750039	September 26, 2008	E-mail from Oscar Paulson, Rio Tinto, to James Webb, U.S. Nuclear Regulatory Commission (Sept. 26, 2008, 18:28 EST)
NRC-009	ML082490372	October 1, 2008	SECY-08-0144, Final Rule: Decommissioning Planning (10 CFR Parts 20, 30, 40, 50, 70, and 72; RIN 3150-AH45) (Oct. 1, 2008)

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Document Number	ADAMS Accession Number (if applicable)	Document Date	Title and Location (if not in ADAMS)
NRC-010	ML082490380	October 1, 2008	SECY-08-0144, Enclosure 1, Federal Register Notice, Final Rule: Decommissioning Planning (10 CFR Parts 20, 30, 40, 50, 70, and 72; RIN 3150-AH45) (Oct. 1, 2008)
NRC-011	ML082490444	October 1, 2008	SECY-08-0144, Enclosure 2, Regulatory Analysis, Final Rule: Decommissioning Planning (10 CFR Parts 20, 30, 40, 50, 70, and 72; RIN 3150-AH45) (Oct. 1, 2008)
NRC-012	ML082490398	October 1, 2008	SECY-08-0144, Enclosure 3, Environmental Assessment, Final Rule: Decommissioning Planning (10 CFR Parts 20, 30, 40, 50, 70, and 72; RIN 3150-AH45) (Oct. 1, 2008)
NRC-013	ML083290482	November 28, 2008	COMSECY 08-0038, Commission Approval to Withdraw SECY-08-0144, "Final Rule: Decommissioning Planning (10 CFR Parts 20, 30, 40, 50, 70, and 72; RIN 3150-AH45)" (Nov. 28, 2008) http://www.nrc.gov/reading-rm/doc-collections/commission/comm-secy/2008/2008-0038comscy.pdf
NRC-014	ML090280476	January 28, 2009	Staff Requirements Memorandum, SECY-08-0144, Final Rule: Decommissioning Planning (10 CFR Parts 20, 30, 40, 50, 70, and 72; RIN: 3150-AH45) and COMSECY 08-0038, Commission Approval to Withdraw SECY-08-0144, "Final Rule: Decommissioning Planning (10 CFR Parts 20, 30, 40, 50, 70, and 72; RIN 3150-AH45)" (Jan. 28, 2009) http://www.nrc.gov/reading-rm/doc-collections/commission/srm/2008/2008-0144srm.pdf
NRC-015	ML090330261	January 28, 2009	Commission Voting Record, SECY-08-0144, Final Rule: Decommissioning Planning (10 CFR Parts 20, 30, 40, 50, 70, and 72; RIN 3150-AH45) (Jan. 28, 2009)
NRC-016	ML090500648	February 1, 2009	SECY-09-0042, Enclosure 3, Environmental Assessment, Final Rule: Decommissioning Planning (10 CFR Parts 20, 30, 40, 50, 70, and 72; RIN 3150-AI55) (Feb. 1, 2009)

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NRC-017	ML090500143	March 13, 2009	SECY-09-0042, Final Rule: Decommissioning Planning (10 CFR Parts 20, 30, 40, 50, 70, and 72; RIN 3150-AI55) (Mar. 13, 2009)
NRC-018	ML090500566	March 13, 2009	SECY-09-0042, Enclosure 1, Federal Register Notice, Final Rule: Decommissioning Planning (10 CFR Parts 20, 30, 40, 50, 70, and 72; RIN 3150-AI55) (Mar. 13, 2009)
NRC-019	ML090500631	March 13, 2009	SECY-09-0042, Enclosure 2, Regulatory Analysis, Final Rule: Decommissioning Planning (10 CFR Parts 20, 30, 40, 50, 70, and 72; RIN 3150-AI55) (Mar. 13, 2009)
NRC-020	ML090510062	March 13, 2009	SECY-09-0042, Enclosure 4, Congressional Review Act (CRA) Forms, Final Rule: Decommissioning Planning (10 CFR Parts 20, 30, 40, 50, 70, and 72; RIN 3150-AI55) (Mar. 13, 2009)
NRC-021	ML090500143	March 13, 2009	Rulemaking Issue, Affirmation, SECY-09-0042, Final Rule: Decommissioning Planning (10 CFR Parts 20, 30, 40, 50, 70, and 72; RIN 3150-AI55) (Mar. 13, 2009)
NRC-022	ML092710582	May 8, 2009	Commissioner Jaczko Vote on SECY-09-0042 – Final Rule: Decommissioning Planning (10 CFR Parts 20, 30, 40, 50, 70, and 72; RIN 3150-AI55) (May 8, 2010)
NRC-023	ML103350029	November 30, 2010	Commission Voting Record, SECY-09-0042, Final Rule: Decommissioning Planning (10 CFR Parts 20, 30, 40, 50, 70, and 72; RIN 3150-AI55) (Nov. 30, 2010)
NRC-024	ML103340418	November 30, 2010	Transcript of Public Meeting, Affirmation Session Regarding the Final Rule: Decommissioning Planning (Nov. 30, 2010)
NRC-025	ML103350034	December 21, 2010	Staff Requirements Memorandum, M101130A, Affirmation Session, 10:00 A.M., Tuesday, November 30, 2010, Commissioners' Conference Room, One White Flint North, Rockville, Maryland (Open to Public Attendance) (Dec. 1, 2010)

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Document Number	ADAMS Accession Number (if applicable)	Document Date	Title and Location (if not in ADAMS)
NRC-026		December 21, 2010	Transcript of Oral Argument, Honeywell v. NRC, No. 10-1022 (D.C. Cir. Dec. 21, 2010)
NRC-027		June 17, 2011	Final Rule; Decommissioning Planning, 76 Fed. Reg. 35,512 (June 17, 2011)
NRC-028		September 15, 2011	NRC Staff Table, Honeywell Financial Data Relied on in Exemption Requests (Sept. 15, 2011)
NRC-029		September 15, 2011	NRC Staff Chart, Honeywell Stock Price vs Standard & Poor's 500 (Sept. 15, 2011)
NRC-030		September 15, 2011	NRC Staff Chart, Various Tangible Net Worth and Net Worth Ratios (Sept. 15, 2011)
NRC-031		September 15, 2011	NRC Staff Chart, Tangible Net Worth Shortfall to Meet 10-to-1 Test of 10 CFR 30, Appendix C (Sept. 15, 2011)
NRC-032		September 15, 2011	NRC Staff Chart, Percentage of Honeywell's Total Goodwill Relied On to Meet Tangible Net Worth Test (Sept. 15, 2011)
NRC-033		March 1981	Financial Accounting Standards Board, Statement of Financial Accounting Standards 47 (Mar. 1981) http://www.gasb.org/pdf/aop_FAS47.pdf
NRC-034		June 1997	Financial Accounting Standards Board, Statement of Financial Accounting Standards 131 (June 1997) http://www.fasb.org/pdf/fas131.pdf
NRC-035		June 2001	Financial Accounting Standards Board, Statement of Financial Accounting Standards 142 (June 2001) http://www.fasb.org/pdf/fas142.pdf

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NRC-036		June 2001	Financial Accounting Standards Board, Statement of Financial Accounting Standards 143 (June 2001) http://www.fasb.org/pdf/fas143.pdf
NRC-037		March 31, 2006	U.S. Securities & Exchange Commission, Honeywell International Inc. Form 10-Q Quarterly Report For Quarterly Period Ending Mar. 31, 2006
NRC-038		September 2006	Financial Accounting Standards Board, Statement of Financial Accounting Standards 157 (Sept. 2006) http://www.fasb.org/pdf/aop_FAS157.pdf
NRC-039		2007	Financial Accounting Standards Board, Statement of Financial Accounting Standards 141, Financial Accounting Series No. 299-A (rev'd 2007) http://www.gasb.org/pdf/fas141r.pdf
NRC-040		2008	Jan R. Williams et al, GAAP Guide Level A 23.04 (CCH Group 2008)
NRC-041		March 2008	Moody's, Special Comment, Corporate One-to-Five-Year Rating Transition Rates (Mar. 2008) http://www.moody.com/sites/products/DefaultResearch/2007100000486361.pdf
NRC-042		July 15, 2008	Testimony, Board of Governors of the Federal Reserve System, Testimony of Chairman Ben S. Bernanke, Semiannual Monetary Policy Report to the Congress, Before the Committee on Banking, Housing, and Urban Affairs, U.S. Senate (Jul. 15, 2008) http://www.federalreserve.gov/newsevents/testimony/bernanke20080715a.htm

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Document Number	ADAMS Accession Number (if applicable)	Document Date	Title and Location (if not in ADAMS)
NRC-043		September 15, 2008	Press Release, Lehman Brothers, Lehman Brothers Holdings Inc. Announces It Intends to File Chapter 11 Bankruptcy Petition (Sept. 15, 2008) http://www.sec.gov/Archives/edgar/data/806085/000110465908059632/a08-22764_4ex99d1.htm
NRC-044		September 15, 2008	Standard & Poor's, Research Update: Lehman Bros. Holdings Downgraded To 'Selective Default'; Other Lehman Entities To 'BB-' Or 'R' (Sept. 15, 2008) http://www.standardandpoors.com/ratings/articles/en/us/?assetID=1245210943266
NRC-045		September 15, 2008	CRS Report for Congress, Fannie Mae & Freddie Mac in Conservatorship (Sept. 15, 2008) http://fpc.state.gov/documents/organization/110097.pdf
NRC-046		September 17, 2008	Press Release, U.S. Securities & Exchange Commission, SEC Issues New Rules to Protect Investors Against Naked Short Selling Abuses (Sept. 17, 2008) http://www.sec.gov/news/press/2008/2008-204.htm
NRC-047		September 18, 2008	Jon Hilsenrath, Serena Ng & Damian Paletta, Worst Crisis Since '30s, With No End Yet in Sight, Wall Street Journal, Sept. 18, 2008 http://online.wsj.com/article/SB122169431617549947.html
NRC-048		September 25, 2008	Press Release, Office of the Comptroller of the Currency, OTS-08-046, Washington Mutual Acquired by JPMorgan Chase (Sept. 25, 2008) http://www.ots.treas.gov/?p=PressReleases&ContentRecord_id=9c306c81-1e0b-8562-eb0c-fed5429a3a56
NRC-049		September 29, 2008	Press Release, U.S. Dept. of the Treasury, Treasury Announces Temporary Guarantee Program for Money Market Funds (Sept. 29, 2008) http://www.treasury.gov/press-center/press-releases/Pages/hp1161.aspx

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NRC-050		September 29, 2008	Press Release, Federal Deposit Insurance Corp., Citigroup Inc. to Acquire Banking Operations of Wachovia (Sept. 29, 2008) http://www.fdic.gov/news/news/press/2008/pr08088.html
NRC-051		September 29, 2008	Press Release, U.S. Dept. of the Treasury, Statement by Secretary Paulson on the Sale of Wachovia Bank (Sept. 29, 2008) http://www.treasury.gov/press-center/press-releases/Pages/hp1164.aspx
NRC-052		October 7, 2008	Press Release, Federal Deposit Insurance Corp., Emergency Economic Stabilization Act of 2008 Temporarily Increases Basic FDIC Insurance Coverage from \$100,000 to \$250,000 Per Depositor (Oct. 7, 2008) http://www.fdic.gov/news/news/press/2008/pr08093.html
NRC-053		November 2008	Anil Kashyap, Raghuram Rajan & Jeremy Stein, The Global Roots of the Current Financial Crisis and its Implications for Regulation, 5th ECB Central Banking Conference (Nov. 2008) http://www.ecb.int/events/pdf/conferences/cbc5/Rajan.pdf?17bea4624be62b27d96a6a290c65da52
NRC-054		December 2008	Ingo Fender & Jacob Gyntelberg, Overview: Global Financial Crisis Spurs Unprecedented Policy Actions, BIS Quarterly Review (Dec. 2008) http://www.bis.org/publ/qtrpdf/r_qt0812a.pdf
NRC-055		December 19, 2008	Press Release, U.S. Dept. of the Treasury, Secretary Paulson Statement on Stabilizing the Automotive Industry (Dec. 19, 2008) http://www.treasury.gov/press-center/press-releases/Pages/hp1332.aspx

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NRC-056		December 31, 2008	U.S. Securities & Exchange Commission, Freeport-McMoRan Copper & Gold Inc Form 10-K Annual Report For Fiscal Year Ending Dec. 31, 2008 http://sec.gov/Archives/edgar/data/831259/000083125909000018/fcx123108-10k.htm
NRC-057		January 2009	Congressional Budget Office, The Budget and Economic Outlook: Fiscal Years 2009 to 2019 (Jan. 2009) http://www.cbo.gov/ftpdocs/99xx/doc9957/01-07-Outlook.pdf
NRC-058		February 2009	Moody's, Special Comment, Corporate Default and Recovery Rates, 1920-2008 (Feb. 2009) http://www.moodys.com/sites/products/DefaultResearch/2007400000578875.pdf
NRC-059		April 2009	Aaron Steelman & John A. Weinberg, Federal Reserve Bank of Richmond, The Financial Crisis: Toward an Explanation and Policy Response (2008) http://www.richmondfed.org/publications/research/annual_report/2008/pdf/article.pdf
NRC-060		May 29, 2009	David Wessel, Another Milestone: U.S. Corporate Defaults to Date Match Total for All '08, Wall Street Journal, May 29, 2009 http://blogs.wsj.com/economics/2009/05/29/another-milestone-us-corporate-defaults-to-date-match-total-for-all-08/
NRC-061		June 12, 2009	Press Release, KPMG, Goodwill Impairment in 2009 (Jun. 12, 2009) http://www.kpmg.com/global/en/issuesandinsights/articlespublications/press-releases/pages/press-release-goodwill-impairment-12-jun-09.aspx
NRC-062		June 18, 2009	US Corporate Defaults, Economist, Jun. 18, 2009 http://www.economist.com/node/13872815

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NRC-063		August 27, 2009	Press Release, Federal Deposit Insurance Corp., FDIC-Insured Institutions Lost \$3.7 Billion in the Second Quarter of 2009 (Aug. 27, 2009) http://www.fdic.gov/news/news/press/2009/pr09153.html
NRC-064		September 29, 2009	Chelsea Emery & Emily Chasan, Unprecedented U.S. Corp. Defaults Seen for '09, Reuters, Sept. 29, 2009 http://www.reuters.com/article/2009/09/29/us-restructuring-summit-bain-idUSTRE58R4QO20090929
NRC-065		October 2009	Jonathan Katz, Emanuel Salinas & Constantinos Stephanou, The World Bank Group, Credit Rating Agencies: No Easy Regulatory Solutions (Oct. 2009) http://rru.worldbank.org/documents/CrisisResponse/Note8.pdf
NRC-066		November 1, 2009	Chapter 11 Voluntary Petition, In re CIT Group, Inc., No. 09-16565 (S.D.N.Y. Nov. 1, 2009) http://timeline.stlouisfed.org/pdf/citbankruptcy.pdf
NRC-067		November 19, 2009	Richard J. Herring, Pew Financial Reform Project, Policy Issues Concerning the Reform of the Credit Rating Agencies (Nov. 19, 2009) http://fic.wharton.upenn.edu/fic/policy%20page/Securitization-2.pdf
NRC-068		January 2007	Moody's, Rating Methodology: Global Aerospace/Defense Industry (Jan. 2007) http://www.moodys.com.br/brasil/pdf/global_aerospace_defense_industry_jan_07.pdf
NRC-069		January 2011	Financial Crisis Inquiry Commission, Final Report of the National Commission on the Causes of the Financial and Economic Crisis in the United States (January 2011) http://www.gpoaccess.gov/fcic/fcic.pdf

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NRC-070		2011	Federal Reserve Bank of St. Louis, The Financial Crisis: A Timeline of Events and Policy Actions (2011) http://timeline.stlouisfed.org/pdf/CrisisTimeline.pdf

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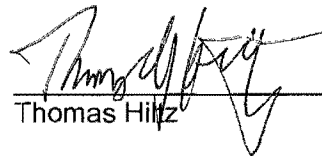
AFFIDAVIT OF THOMAS HILTZ CONCERNING MANDATORY
DISCLOSURE REQUIREMENTS OF 10 C.F.R. § 2.336(c)

I, Thomas Hiltz, do hereby state as follows:

1. I am employed as Branch Chief in the Nuclear Regulatory Commission's Office of Nuclear Material Safety and Safeguards; Division of Division of Fuel Cycle Safety and Safeguards; Fuel Facility Licensing Directorate; Conversion, Deconversion and Enrichment Branch. My supervisory responsibilities include oversight of the NRC Staff's review and evaluation of Honeywell International Inc.'s April 2009 application for an exemption from the financial assurance requirements at 10 C.F.R. § 40.36. In this capacity, I am managing the preparation of the NRC Staff's disclosures in this proceeding.

2. I hereby certify that all materials the Staff must disclose under the requirements of 10 C.F.R. § 2.336, as modified by the Board's August 23, 2011 Order, have been disclosed, and that the disclosures are accurate and complete as of the date of this certification.

3. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.


Thomas Hiltz

Executed in Rockville, Maryland
this 15th day of September, 2011

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CERTIFICATE OF SERVICE

I hereby certify that copies of the "NRC STAFF'S DISCLOSURES" have been served through the Electronic Information Exchange (EIE) this 15th day of September, 2011, which to the best of my knowledge resulted in transmittal of the foregoing to those on the EIE Service List for this proceeding.

***/Signed (electronically) by/
Patricia Jehle***

Patricia Jehle
Counsel for NRC Staff