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SUB-526, Docket # 40-3392.

Subject: SUBSEQUENT REPLY TO REQUEST FOR ADDITIONAL INFORMATION REGARDING SMALL CYLINDER FILLING PROCESS APPROVAL AND LICENSE AMENDMENT REQUEST (TAC NO. L32450)

This letter is Honeywell Metropolis Works (MTW) response to the NRC Request for Additional Information Regarding Small Cylinder Filling Process Approval and License Amendment Request (TAC No. L32450) dated November 14, 2008.

Following is the MTW response to the RAI questions:

RAI-5

The Table on page 6 of the license amendment application lists the three accident scenarios (DI-3, DI-4, and DI-6) related to cylinder filling and handling and the Plant Features and Procedures (PFAPs) associated with each scenario. The staff compared the list to the PFAPs listed in the ISA, page 9-17, Table 9.1, "Plant Features and Procedures." For scenario DI-4, the ISA identifies a PFAP83 that is not included in the PFAP list for the license amendment request. PFAP83 appears relevant to the small cylinder filling since it is described as a safety function, prior to filling, in which the pigtail is inspected, new gaskets installed, and the pigtail leak tested.

The licensee is requested to clarify whether PFAP 83 would be implemented for the small cylinder filling or provide other appropriate explanation.

NMSS01

Honeywell will implement PFAP 83 for the small cylinder filling process. The accident scenario DI-4 will be prevented by the following PFAPs:

Table Withheld Under 10 CFR 2.390

Safety features listed in the PFAPs will be documented as requirements of the formal Standard Operating and Training Procedures.

RAI-6

On page 7, 6th paragraph, Honeywell states that the accident scenario DI-4 was evaluated to have an acceptable unmitigated risk value. The licensee is requested to provide an explanation of the evaluation supporting this statement, including assumptions and important parameters, such as the source term.

As demonstrated above, Honeywell is not planning to take credit for "an acceptable unmitigated risk value" of the accident scenario DI-4 and will implement 3 preventive PFAPs (PFAP 81, 82 and 83). All associated management measures will be applied to ensure that these PFAPs are reliable and available to perform their function.

RAI-7

Under Section 1.6 of the License SUB-526, Honeywell proposes adding a paragraph that states:

> *Small product cylinder packages (12B or 30B partially filled cylinder and their frames) are moved inside the Feed Materials Building by a fork truck. Once weighed, the package is moved by the fork truck to a specified location and UF6 in the cylinder is allowed to solidify. The cylinder after being removed from the frame will be prepared for shipment.*

On page 4 of the application, Honeywell mentions that the 12B cylinder will be moved within the Feed Materials Building by certified wheeled cylinder mover. The licensee is requested to clarify whether the movement will be by fork truck or wheeled cylinder mover. If movement may occur with a wheeled cylinder mover, provide a change page with the revised paragraph.

The partially filled horizontal 30B cylinder package (cylinder and its supporting cradle) will be moved while inside the Feed Materials Building by a fork truck; the vertical 12B cylinder will be moved with a certified wheeled cylinder mover. Once weighed the 30B package is moved outside the Feed Materials Building by fork truck and the UF_6 is allowed to solidify. The 12B cylinder and wheeled cylinder mover are placed in a weight certified framed cage and moved by fork truck outside for UF_6 solidification. Both cylinder packages will be stored in a specified location until the cylinders are ready to be shipped. At this time the cylinders will be removed from their respective cradle/frame.

RAI-8

On pages 7 through 8, Honeywell states that since the smaller cylinders will not be moved by crane, the PFAPs related to crane operation and failure are not applicable. In the July 14, 2008 PHA Final Report, Honeywell describes that the dropping of a 12B cylinder under any credible scenario was evaluated. Honeywell states that the 12B cylinder is required to pass a 1.2 m (4 ft) drop test without loss of contents and that the dropping of a 12B cylinder under any credible scenario was evaluated and none exceeded this height.

The licensee is requested to provide an explanation of any controls applied to prevent a cylinder being elevated no more than 1.2 m during in-plant transport or provide other appropriate explanation.

All Honeywell fork truck operators are trained and tested using formalized procedures, which clearly specify the maximum height above the ground, pavement or other surface any load is to be carried. There will be a supervisor in the area whenever any full or partially filled 12B cylinder is moved outside the Feed Materials Building. Therefore, no 12B with corresponding package will be carried more than 12-15 inches above the pavement, which is well below the 48 inch drop test limit.

We hope that this response provides sufficient information for NRC's review. If you have additional questions, please contact Mr. Larry Parscale, Nuclear Regulatory Affairs Manager, at 618-524-6221.

Sincerely,

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Plant Manager

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