

Performance Materials and Technologies

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

March 26, 2012

Certified Mail: 7011 0470 0000 6688 6105

ATTN: Document Control Desk
Director, Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

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

RE: REPLY TO A NOTICE OF VIOLATION
NRC INSPECTION REPORT 40-3392/2011-005 AND NOTICE OF VIOLATION

This letter is Honeywell Metropolis Works' response to the NRC Inspection Report 40-3392/2011-005 and Notice of Violation dated January 24, 2012.

During the NRC inspection conducted from October 1, 2011 through December 31, 2011, two violations of NRC requirements were identified. Pursuant to the provisions of 10 CFR 2.201, Honeywell was required to submit a written reply within 30 days of the Notice of Violation. According to Honeywell's telephone communication with J. Calle, Chief, USNRC Region II Fuel Facility Inspection Branch 2, followed by a written (via e-mail) confirmation, dated February 22, 2012, this 30-day period was extended to 60 days. Honeywell is admitting the violation 40-3392/2011-005-02 and denying the violation 40-3392/2011-005-01. A denial is addressed in a separate document.

In accordance with the NRC Enforcement Policy, the violation 40-3392/2011-005-02 is listed below along with information required to be included in the reply pursuant to 10 CFR 2.201.

- B. License Condition No 18, in License Number SUB-526, Amendment 8, dated February 28, 2011, states, in part, that the licensee shall conduct authorized activities in accordance with the statements, representations and conditions (or as revised by the approved configuration management process as described in item J) in the specific documents, including the License Application, dated May 12, 2006, and in the Safety Demonstration Report (SDR), dated May 12, 2006.

Section 2.6.3, Configuration Control, of the License Application, dated July 19, 2011, states, in part, that the licensee shall establish a configuration management system to evaluate, implement, and track all proposed changes to the site, structures, processes, systems, components, computer programs, and activities of personnel.

Section 1.8.12, Management of Change (MOC), of the SDR, revision 10, dated July 19, 2011, states, in part, types of changes subject to the MOC process

IED7

include any change that may be detrimental to employee health and safety or the integrity of process equipment and the infrastructure of Honeywell.

Contrary to the above, the licensee failed to implement the configuration management system, MOC process, to assure proper review and approval of changes to specified equipment that could be detrimental to employee health and safety. Specifically, equipment changes were made to the administration building uninterruptible power supply (UPS), which is a component through which electrical power is supplied to emergency response equipment, including all hardwired telephones, offsite public Rapid Notify call-out system, fence line HF monitors, onsite public announcement system, visual monitors, and accountability card readers. The licensee failed to implement the MOC process to assure proper reviews and approvals of changes were performed, as described in the following examples:

1. On October 23, 2003, the licensee replaced the UPS under a like-for-like routine repair work order, Order # 100195788. The UPS replacement was installed without an external bypass wiring connection to remove the UPS from the circuitry in the event of an UPS failure or maintenance, and the licensee was not aware of this configuration. The MOC process was not implemented for this change.
2. On and before March 4, 2011, the licensee installed an air conditioning unit in the UPS room and connected the electrical power supply to an UPS supported electrical panel. The MOC process was not implemented for this change.

This is a Severity Level IV violation (Section 6.2.d).

Reason for the Violation:

Honeywell personnel who performed administration building UPS circuitry configuration changes did not correctly evaluate an impact of the planned UPS-related modifications on emergency preparedness capabilities, and hence, employees health and safety. This personnel failed to recognize that Management of Change procedure, MTW-ADM-REG-0120, requirements are applicable to the planned UPS-related modifications.

Corrective Steps that Have Been Taken and the Results Achieved:

- Management of Change process training was presented to new Honeywell personnel on 1/9/12 (in addition to a mandatory internet based training course) to enhance awareness of the MOC procedure requirements.
- Management of Change procedure, MTW-ADM-REG-0120, was modified on 9/12/11 to facilitate reviews and approvals of emergency changes and ensure safety of personnel and equipment integrity.
- Organizational change was made on 3/9/12 to consolidate the Radiation Protection and the Regulatory Affairs departments. This restructuring is expected to enhance management oversight of the department programs, and particularly to improve effectiveness and regulatory compliance of the MOC program.

Corrective Steps that Will Be Taken to Avoid Further Violations:

- o Develop and distribute a communication to affected electronic Management of Change (eMOC) system users, plant personnel, and/or contractors clarifying that an eMOC is required for additions or deletions to UPS supported equipment. Target date: 5/31/12.

Date When Full Compliance Will Be Achieved:

Honeywell is currently in full compliance with License Condition 18 of NRC License Number SUB-526 Amendment 8, dated February 28, 2011, Section 2.6.3, Configuration Control, of the License Application, dated July 19, 2011, and Section 1.8.12, Management of Change (MOC), of the SDR, revision 10, dated July 19, 2011.

If you have questions, need additional information, or wish to discuss this matter, please contact Mr. Robert Stokes, Radiation Protection Program Manager, at (618) 524-6341.

Sincerely,


Larry A. Smith
Plant Manager 

cc: Regional Administrator
Region II, U.S. Nuclear Regulatory Commission
245 Peachtree Center Ave., NE, Suite 1200
Atlanta, GA 30303-1257

Region II, US Nuclear Regulatory Commission
Attention: Mr. Joselito O. Calle
245 Peachtree Center Ave., NE, Suite 1200
Atlanta, GA 30303-1257