



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
245 PEACHTREE CENTER AVENUE NE, SUITE 1200
ATLANTA, GEORGIA 30303-1257

June 19, 2013

EA-12-157

Mr. Larry Smith
Plant Manager
Honeywell International Inc.
P.O. Box 430
Metropolis, IL 62960

SUBJECT: HONEYWELL INTERNATIONAL INC. - PARTIAL RELAXATION OF
SECTION IV, ITEM 4 OF CONFIRMATORY ORDER (EA-12-157), DATED
OCTOBER 15, 2012

Dear Mr. Smith:

The Nuclear Regulatory Commission (NRC) has reviewed your letters dated May 17, June 10, and June 13, 2013, requesting partial relaxation of NRC Confirmatory Order EA-12-157 (the Order), Section IV, Item 4. Section IV, Item 4 of the Order states:

After Honeywell completes Items 1-3 and the NRC verifies the acceptability of the facility modifications referred to in Item 1.c, Honeywell may seek NRC approval to resume licensed operations at the Metropolis Works facility. Honeywell shall submit its request to the NRC in writing at least 30 days before it intends to resume licensed operations at the Metropolis Works facility. Honeywell shall not resume licensed operations until the NRC grants its request in writing.

Your requests for partial relaxation involve three elements: (1) relaxation of the 30-day notification period, (2) relaxation to allow the conduct of limited licensed operations in the Ore Preparation and Green Salt areas of the facility, and (3) relaxation to allow the transfer of uranium hexafluoride (UF₆) from a limited number of storage cylinders to the cold traps in vapor form only.

Relaxation of the 30-day notification requirement

The NRC required Honeywell to provide 30 days advance notification of its intent to resume licensed operations in order to allow the NRC staff time to inspect the facility modifications referred to in Item 1.c of the Order. The NRC staff has now completed all planned inspections of Honeywell's modifications to the Metropolis Works facility. The NRC staff has documented the results of its inspections in Inspection Report 040-3392/2013-003. On May 9, 2013, Honeywell sought NRC approval to resume licensed operations at the Metropolis Works facility. Because Honeywell submitted its restart request *before* the NRC completed its inspections, however, Item 4 in Section IV of the Order would have required Honeywell to submit an additional restart request once those inspections were complete. Given that the NRC has

completed its inspections of the Metropolis Works facility and is well aware of Honeywell's intent to resume licensed operations, there is no need for Honeywell to submit any additional restart request. Therefore, upon good cause shown, the NRC relaxes Section IV, Item 4 of the Order to the extent that it required Honeywell to defer its restart request until after the NRC completed inspections of the Metropolis Works facility. With this provision relaxed, Honeywell's May 9, 2013 request satisfies the requirement that it notify the NRC in writing at least 30 days before it intends to resume licensed operations.

Ore preparation and green salt operations

In letters dated June 10 and June 13, 2013, you requested authorization to perform limited operations to commission two process lines: Ore Preparation and Green Salt. You stated Ore Preparation involves only the blending, agglomerating, drying, and crushing of incoming ore concentrates that results in a uniform particle size distribution (i.e., "prepared feed"). The Green Salt process involves hydrofluorination of "prepared feed" to produce solid UF_4 (green salt). You stated that the chemistry of these two process lines does not involve UF_6 in any form or phase. To demonstrate good cause your request stated the following:

- The procedures employed for the proposed limited operations are current and qualified workers and contractors will be used for operating and maintaining these two process lines.
- Emergency Response Plan staffing, equipment and procedures will remain in place during the time of limited operations.
- In the event of an accident involving these process lines, there would be no consequence to members of the public.
- Honeywell workers and contractors will be trained on occupational safety matters, including the use of personal protective equipment (PPE).
- An Emergency Response Team (ERT) will be maintained onsite to provide first aid response and emergency mitigation for chemical incidents.

Recovery of crude UF_6 from cylinders

In letters dated May 17 and June 10, 2013, you requested authorization to perform limited operations to recover the crude UF_6 from 48Y cylinders into Primary Cold Traps. To demonstrate good cause, you specified the following limits for operations:

- Limiting operations to a transfer of UF_6 in vapor phase only (and not liquid) which will prevent any potential consequence to workers or the public.
- Limiting the duration of the operation to approximately 72 hours.
- Ensuring that Emergency Response Plan staffing, equipment, and procedures remain in place during the period of limited operations.
- Permitting only trained and qualified individuals in the distillation areas during the period of limited operations.

NRC Evaluation and Conclusion

Independent NRC inspections have determined the following:

1. Ore preparation and green salt operations

An NRC staff review of the potential hazards to a worker or the public as a result of ore preparation and green salt operations concluded that those operations pose little to no radiological or chemical risk. Specifically, NRC inspections have found that:

- The systems, structures, and components needed to support the limited operations in ore preparation and green salt are operable.
- Workers are adequately trained to operate the ore preparation and green salt areas of the facility.
- Workers have been adequately trained in the proper use of PPE.
- The facility has demonstrated the ability to adequately implement its Emergency Response Plan including the staffing of the ERT.

2. Recovery of UF₆ from Crude Cylinders

NRC review of the potential hazards to a worker or the public as a result of recovery of UF₆ from crude cylinders concluded that this operation poses little to no radiological or chemical risk. Specifically, NRC inspections have found that:

- The systems, structures, and components needed to support the limited UF₆ transfer operations are operable.
- Workers are adequately trained to operate the UF₆ transfer equipment.
- Workers have been adequately trained in the proper use of PPE.
- The transfer of UF₆ solely in the vapor phase will reduce the possibility of potential consequence to workers and the public.
- The facility has demonstrated the ability to adequately implement its Emergency Response Plan including the staffing of the ERT.

Summary of NRC Action

The NRC relaxes Section IV, Item 4 of Confirmatory Order EA-12-157 so that it reads as follows:

Honeywell may seek NRC approval to resume licensed operations at the Metropolis Works facility by submitting its request to the NRC in writing at least 30 days before it intends to resume such operations.

As of June 17, 2013, the NRC authorizes Honeywell to perform the limited operations to commission the Ore Preparation and Green Salt equipment lines and recover the crude UF₆ from 48Y cylinders into Primary Cold Traps, as requested in Honeywell's letters dated June 10 and 13, 2013. Honeywell shall not resume additional licensed operations until the NRC grants its request in

L. Smith

4

writing. The remaining processes at the Honeywell facility are being evaluated by NRC staff and will stay in a shutdown status until that review is complete and restart is authorized.

As stated above, as a result of this partial relaxation of the Order, Honeywell's May 9, 2013 restart request satisfies the requirement that it notify the NRC in writing at least 30 days before it intends to resume licensed operations.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room (PDR) or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> in the Public Electronic Reading Room.

If you have any questions, or you would like to schedule a meeting with us, please contact Mr. James Hickey at (404) 997-4628.

Sincerely,

/RA/

Victor M. McCree
Regional Administrator

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

cc: (See page 5)

L. Smith

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Sincerely,

/RA/

Victor M. McCree
Regional Administrator

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

cc: (See page 5)

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