

June 17, 2014

MEMORANDUM TO: Anthony T. Gody, Director  
Division of Fuel Facility Inspection  
Region II

FROM: Marissa G. Bailey, Director **/RA/**  
Division of Fuel Cycle Safety  
and Safeguards  
Office of Nuclear Material Safety  
and Safeguards

SUBJECT: REVIEW OF HONEYWELL'S REVISED INTEGRATED SAFETY  
ANALYSIS SUMMARY FOR SEISMIC AND HIGH  
WIND/TORNADO EVENTS SAFETY BASIS (TECHNICAL  
ASSIGNMENT CONTROL NO. L36026)

The U.S. Nuclear Regulatory Commission staff reviewed Honeywell's revised Integrated Safety Analysis (ISA) Summary, submitted by letter dated October 28, 2013 (Agencywide Documents Access and Management System [ADAMS] Accession No. ML13317B661) and supplemented by letter dated May 22, 2014. Submittal of the revised ISA Summary was required by Section IV, Item 6, of the Confirmatory Order EA-12-157 (ADAMS Accession No. ML12289A800). The Order required that the revised ISA Summary be submitted no later than six months after resuming licensed operations at the Metropolis Works (MTW) facility (i.e., December 20, 2013). To meet Section IV, Item 1, of Confirmatory Order EA-12-157, Honeywell previously submitted its Safety Basis and Corrective Action Plan (SBCAP), which described Honeywell's safety basis for the proposed modifications to its MTW facility.

The purpose of the staff's review of the revised ISA Summary was to ensure that the safety basis for the seismic and high wind/tornado events is adequately described in the revised ISA Summary. The staff also assessed whether this description is consistent with the safety basis previously evaluated by the staff and documented in the staff's *Technical Evaluation Report (TER) for Safety Basis and Corrective Action Plan Leading to Restart* (ML13168A187). The focus of the review was on completeness and accuracy, including verifying that the translation of the SBCAP into the ISA Summary is consistent with the TER and generally meets the *Standard Review Plan for the Review of a License Application for a Fuel Cycle Facility* (NUREG-1520). The staff also reviewed the commitments in License No. SUB-526 related to the evaluation, implementation and documentation of facility changes to ensure that future facility changes will uphold the safety basis for tornado and seismic events.

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A summary of the staff's review of the revised ISA Summary is enclosed. The staff found that the ISA Summary contains information that is consistent with the safety basis provided to the staff for their previous review for the seismic and high wind/tornado events. Also, the level of detail and content in the revised ISA Summary is consistent with the TER and generally meets the guidance for ISA Summary documentation in NUREG-1520.

Honeywell references the SBCAP in the revised ISA Summary. Because License Condition 18 incorporates the ISA Summary into the license, this reference incorporates the restart safety basis into the license. Honeywell also commits in the revised ISA Summary to maintain the safety basis for the seismic and high wind/tornado events as described in the ISA Summary. Since the ISA Summary references the SBCAP and contains an adequate summary of the safety basis for the seismic and high wind/tornado events, and because Honeywell has committed to maintain the safety basis described in the ISA Summary, the staff finds that the revised ISA Summary is acceptable for meeting Section IV, Item 6, of the Order.

Based on its review of Honeywell's revised ISA Summary, the staff finds that Honeywell has met all of the requirements of the Confirmatory Order EA-12-157.

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

Enclosure:  
Review of Revised ISA Summary for Seismic and High Wind/Tornado Events Safety Basis

A summary of the staff's review of the revised ISA Summary is enclosed. The staff found that the ISA Summary contains information that is consistent with the safety basis provided to the staff for their previous review for the seismic and high wind/tornado events. Also, the level of detail and content in the revised ISA Summary is consistent with the TER and generally meets the guidance for ISA Summary documentation in NUREG-1520.

Honeywell references the SBCAP in the revised ISA Summary. Because License Condition 18 incorporates the ISA Summary into the license, this reference incorporates the restart safety basis into the license. Honeywell also commits in the revised ISA Summary to maintain the safety basis for the seismic and high wind/tornado events as described in the ISA Summary. Since the ISA Summary references the SBCAP and contains an adequate summary of the safety basis for the seismic and high wind/tornado events, and because Honeywell has committed to maintain the safety basis described in the ISA Summary, the staff finds that the revised ISA Summary is acceptable for meeting Section IV, Item 6, of the Order.

Based on its review of Honeywell's ISA Summary, the staff finds that Honeywell has met all of the requirements of the Confirmatory Order EA-12-157.

Docket No. 40-3392

License No. SUB-526

Enclosure:

Review of Revised ISA Summary for Seismic and High Wind/Tornado Events Safety Basis

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