

November 12, 2014

Attention: Victor Mc Cree, Regional Administrator
U.S. Nuclear Regulatory Commission, Region II
245 Peachtree Center Avenue NE, Ste. 1200
Atlanta, GA, 30303-1257

References:

- 1) Letter from Victor Mc Cree, Regional Administrator, to Honeywell, Confirmatory Action Letter – Honeywell Metropolis Works, dated November 7, 2014

Subject: Response to Confirmatory Action Letter – Honeywell Metropolis Works, dated November 7, 2014

Honeywell Metropolis Works hereby submits the response to the Confirmatory Action Letter – Honeywell Metropolis Works, dated November 7, 2014. As requested in the referenced letter, Honeywell notifies in writing that it has completed the actions addressed in this NRC's letter.

The following actions addressed in the Confirmatory Action Letter have been taken and completed:

1. The investigation of the classification of the event and proposed corrective actions has been completed. The causes of this misclassification are as follows:
 - a. The event misclassification was due to inadequate visual observation on the part of both the Radiation Safety Officer (RSO) and Incident Commander (IC). The location of the control point, while adequate from an Emergency Response point of view, did not offer a full view of the incident to facilitate a visual observation based on prevailing winds.
 - b. The event classification examples in use at the time resulted in the interpretation of the use of "and" when evaluating plume conditions "and" distance, vs. a more conservative "or".
 - c. The October 26, 2014, event has been reevaluated and classified as an Alert. Pursuant to 10 CFR 40.31(j)(3)(viii), Honeywell has notified the NRC Operations Center of the discovery of the after-the-fact emergency condition on November 5, 2014 (Event Number 50594).
2. Revisions to the Emergency Response Procedures are as follows:
 - a. MTW's emergency preparedness procedures have been reviewed and revised on November 6, 2014, to ensure that events can be classified correctly. Thus, MTW-ADM-EPIP-0002, Emergency Classification and Notification, has been modified to clarify Attachment A, Alert Classification, that Examples of UF₆ release scenarios are independent of each other. MTW-ADM-EPIP-0003, Crisis

Management and Incident Command Staff Responsibilities, has been revised to better address the actions of the Incident Commander and the Radiation Safety Officer when classifying an emergency, and to add the requirement to reassess the classification upon any change in condition or additional observation to both positions. The appropriate training has been completed to the emergency response officers to address emergency response procedural changes

- b. Two mitigation towers have been identified as the most appropriate safety features for exterior coverage of the Feed Materials Building (FMB). Control Room officers and operators have been trained to initiate mitigation spray towers upon initial discovery of a chemical release in the FMB. MTW-EOP-DIS-0600, Distillation Emergency Procedure, and MTW-SOP-TFO-0705, Testing of HF Mitigation Spray Tower System, procedures have been modified to change the default setting of these towers on November 4, 2014.
 - c. RSO and IC training of revisions has been completed and documented with all active RSO's and IC's
3. The NRC inspected Emergency Preparedness Exercise was conducted on November 12, 2014, to demonstrate effective implementation of Honeywell's emergency preparedness procedures and training.

Consequently, Honeywell Metropolis Works has completed all the commitments set forth in the Confirmatory Action Letter. If you have questions, need additional information, or wish to discuss this notification, please contact Mr. Mark Wolf, Nuclear Compliance Director, at (618) 309-5013.

Sincerely,



Jim Pritchett
Plant Manager

cc: