



Performance Materials and Technologies
2768 North U.S. 45 Road
P.O. Box 430
Metropolis, IL 62960
www.honeywell.com

April 3, 2017

Tilda Liu, Sr. NMSS Project Manager
U.S. Nuclear Regulatory Commission, Region II
245 Peachtree Center Ave. NE, Suite 1200
Atlanta, GA 30303

Subject: Honeywell Metropolis Surface Impoundment Decommissioning Plan

References:

- 1) Docket No. 40-3392; License SUB-526
- 2) Honeywell submittal dated December 2, 2010; ADAMS Accession No. ML103400456
- 3) NRC approval letter dated September 27, 2013; ADAMS Accession No. ML13133A151
- 4) Amendment Number 10; ADAMS Accession No. ML13133A179
- 5) MTW Pond Closure submittal to IEPA (as attachments)

By letter dated December 2, 2010 (Agencywide Documents Access and Management System [ADAMS] Accession No. ML103400456), and as supplemented by letters dated February 25, 2011 (ADAMS Accession No. ML110620251), and March 4, 2011 (ADAMS Accession No. ML110750234), Honeywell submitted a license amendment request (LAR) regarding its proposed Surface Impoundment Decommissioning Plan to the U.S. Nuclear Regulatory Commission (NRC). Specifically, Honeywell sought NRC approval to decommission four surface impoundments (i.e., retention ponds) at the Honeywell Metropolis Works site and release the ponds from its Materials License for unrestricted use under Section 20.1402 of Title 10 of the *Code of Federal Regulations* (10 CFR).

This plan was approved by NRC in a letter dated September 27, 2013 (ADAMS Accession No. ML13133A151). As a part of that approval, NRC imposed two separate License Conditions (LC) related to sampling of the material during closure activities, specifically LC 18K and LC30. These conditions were codified in Amendment 10 (ADAMS Accession No. ML13133A179). Neither condition prohibits Honeywell from pursuing alternative decommissioning options.

License Condition 18K - The licensee shall conduct authorized activities at the Honeywell Metropolis Works Facility in accordance with the statements, representations and conditions (or as revised by the approved configuration management process as described in Item J) in:.....K. *Amendment Request dated December 2, 2010,*

as supplemented by letters dated February 25, 2011, and March 4, 2011, regarding surface impoundment decommission plan, with Condition 30 below.

License Condition 30.- Before proceeding with implementation of the pond closure actions proposed in the LAR dated December 2, 2010, and as supplemented by letters dated February 25, 2011, and March 4, 2011, Honeywell shall obtain additional samples and isotopic analyses of pond material from each of the four ponds in order to comply with the number of sample locations calculated in accordance with the guidelines of Multi-Agency Radiation Survey and Site Investigation Manual. Honeywell shall not proceed with pond closure until the results of the sampling have been provided to the NRC and the NRC staff has verified that the contents of the submittal are acceptable. NRC acceptance of the pond closure plan is with respect to NRC regulations and Honeywell shall continue to be obligated to comply with all federal and state laws and regulations governing the ponds.

As previously discussed, the Honeywell Metropolis facility is now planning to close the surface impoundments by excavating the material, transporting the material for disposal at an existing offsite disposal facility licensed to accept it, and restoring the site. In addition, the facility desires for the property occupied by the ponds, once closed, to remain available for future use involving licensed activities. The two license conditions referenced above therefore can be removed from the license. To conserve resources, we propose that the license conditions be removed as part of the current License Renewal cycle rather than as a separate license amendment request.

We have enclosed a copy of the notification letter and supporting materials which have been submitted to the Illinois Environmental Protection Agency (IEPA).

If you have any questions or need additional information, please let me know.



Mark A. Wolf
Nuclear Compliance Director
Honeywell Metropolis