



# METROPOLIS WORKS

UF<sub>6</sub> Conversion

**Honeywell**

## Honeywell Metropolis USNRC Source Material License SUB 526

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- Current status of MTW license
  - MTW license = SUB-526
  - Current Amendment is #11; date = August 11, 2014
  - MTW license expires – May 11, 2017
- Status of renewal activities
  - Formal license renewal package delivered to NRC February 16, 2017
  - License renewal package includes the following documents
    - License Renewal Application
    - NRC form 313
    - Letter of justification for extended term license renewal
    - ISA Summary (by reference)
    - Environmental Report
    - Emergency Response Plan (by reference)
    - Decommissioning Funding Plan (by reference)
  - License renewal term requested = 40 years

# Application Overview

- **Elements of Existing License**
  - “Two-Part” License Application (per Reg Guide 3.55)
    - License Application and
    - “Safety Demonstration Report” (SDR)
  - Environmental Report (per NUREG 1748)
  - Emergency Response Plan
  - Decommissioning Funding Plan (DFP) / Decommissioning Cost Estimate (DCE)
  - Integrated Safety Analysis (ISA) Summary
- **Elements of 2017 Renewal**
  - “One-Part” License Application
    - Meets intent of NUREG-1520
    - SDR – removed and consolidated into the new application and ISA Summary
  - Environmental Report (updated to reflect 40-year term)
  - Emergency Response Plan (incorporated by reference)
  - DFP/DCE (incorporated by reference)
  - ISA Summary – updated and changes submitted annually per existing license condition (incorporated by reference)

# Honeywell Metropolis ISA

- MTW enhanced/upgraded its licensing basis through Part 40 ISA
- During the 2007 license renewal cycle, Honeywell *voluntarily* agreed to develop, execute, and maintain an ISA
  - MTW ISA modeled after Part 70
  - MTW did not commit to, nor did NRC require, a full Part 70 ISA
  - NRC concluded that:
    - MTW method consistent with Part 70 ISA guidance in NUREG-1513
    - MTW identified and adequately evaluated credible accident scenarios
    - MTW identified appropriate plant features and procedures (PFAPs) and management measures
- The ISA and its elements have been subject to *review and inspection* during the course of the current license cycle.
  - MTW completed implementation of ISA results on November 8, 2007
  - ISA subject to configuration management measures
  - MTW submits annual reports to NRC

# License Conditions for ISA

- The ISA is currently incorporated into SUB-526 as several license conditions
  - 18D = *Integrated Safety Analysis (ISA) Summary*
  - 19 = *Within 180 days of the issuance of the renewed license, all Plant Features and Procedures (to be designated PFAP) shall be developed and implemented within the ISA. The implementation shall include the Configuration Management Program and Facility Change Process.*
  - 20 = *For changes to the site, structure, processes, systems, components, computer programs, and activities of personnel within the identified PFAP and safety control boundaries that do not require prior NRC approval, Honeywell shall prepare and submit to NRC, within 30 days after the end of the calendar year in which the change was implemented, a brief summary of all such changes. For all changes that affect the Metropolis Works Facility ISA, Honeywell shall submit to the NRC, within 30 days after the end of the calendar year in which the changes were implemented, either a revised ISA summary or revised ISA summary pages, as appropriate.*