

Honeywell

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July 12, 2018

UPS/Next Day Air

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Director, Office of Nuclear Material Safety and Safeguards
11555 Rockville Pike
Rockville, MD 20852

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

SUBJECT: HONEYWELL METROPOLIS WORKS UNIMPORTANT QUANTITIES
SUBMITTAL

The purpose of this correspondence is to notify you of our intent to ship certain materials from the Metropolis Works facility (MTW) to the U.S. Ecology facility in Grandview, Idaho (USEI). The USEI disposal facility is a Resource Conservation and Recovery Act (RCRA) Subtitle C hazardous waste treatment and disposal facility permitted by the State of Idaho and has a long and established record of safe and secure disposal of low-activity radioactive wastes.

This letter also serves to provide information that Honeywell intends to transfer certain Nuclear Regulatory Commission licensed (SUB-526) material to USEI under 10 CFR 40.51(b)(3). In accordance with prior Commission decisions, no prior NRC approval for the transfer is required so long as the material meets the criteria in 10 CFR 40.13(a). Section 40.13(a) states that any person is exempt from the regulations in Part 40 and the requirements for a license set forth in Section 62 of the AEA, to the extent that such person transfers or delivers source material in any mixture, compound, solution, or alloy in which the source material is less than 0.05 wt%.

USEI is authorized to dispose of low-activity radioactive materials exempt from regulation by the Atomic Energy Act of 1954, as amended, through regulatory authority provided by Idaho law and regulation. Radioactive material disposal limits, radiological performance assessment and source term reporting, environmental monitoring, limitations for potential exposure to radioactive material, and closure and post-closure requirements are included in USEI's RCRA Subtitle C permit and implemented through regulation by Idaho Department of Environmental Quality. Honeywell has in its possession, and has read, a current copy of USEI's permit.

NM5520

As described in the enclosure, the MTW site includes four surface impoundments, identified as Ponds B, C, D, and E, that store calcium fluoride (CaF₂) material generated from past operations. Pond A materials were previously removed and disposed of at a RCRA Subtitle C disposal facility. Honeywell intends to use the same approach for Ponds B, C, D, and E. The material in Ponds B, C, D, and E contains trace amounts of naturally occurring radioactive isotopes including, but not limited to, uranium and thorium. Honeywell has an estimated 89,000 cubic yards of calcium fluoride from the Pond B, C, D, and E remediation effort that contains an average of 0.04 wt% of uranium (374.5 ppm). The source material content therefore is below the limit in 10 CFR 40.13(a).

In addition, a dose assessment was performed using USEI's NRC-Approved *Site Specific Dose Assessment Methodology*. The assessment demonstrates that the potential maximum dose to the workers involved in the transportation and placement of the material and to members of the general public after site closure is very low. The results of this analysis are described in the enclosure. The NRC has previously indicated that it would not object to transfers of material pursuant to § 40.51(b)(3) if the potential projected doses are determined to be less than 1 mSv (100 mrem) per year.

Honeywell currently manages the CaF₂ ponds in accordance with a RCRA Permit issued by the Illinois EPA and a waiver of the minimum technology requirements (MTR Waiver) for hazardous waste impoundments issued by the USEPA. The RCRA Permit and MTR Waiver currently require that Honeywell close Ponds B, C, D, and E by 2020. To comply with the current closure deadline, Honeywell must remove the material in a timely manner. The current plan is to begin shipping the pond material to USEI as early as the 4th Quarter of 2018. Once the closure activity is complete, the pond areas will no longer be subject to IEPA or USEPA RCRA requirements. MTW will include the areas formerly occupied by the ponds in the MTW 2022 Decommissioning Cost Estimate.

If you have questions or comments regarding this submittal, please contact Mr. Sean Patterson, Regulatory Affairs Manager, at (618) 524-6341.

Sincerely,



Jeff Fulks
Plant Manager

Enclosure 1 – Unimportant Quantities Submittal Report U.S. NRC License No. SUB-526
Closure of Surface Impoundment Ponds B, C, D, and E.

Cc: U.S. NRC Region II
Marquis One Tower
Attention: Tilda Liu

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