



METROPOLIS WORKS

UF₆ Conversion

Honeywell

Unimportant Quantities Submittal

- HON notified NRC of its intent to transfer the pond materials to USEI for disposal in letter, dated July 12, 2018.
 - Approximately 89,000 cubic yards of CaF₂ from Ponds B, C, D, and E containing an average of 0.04 wt% of uranium (374.5 ppm)
 - The calcium fluoride materials contains source material under 0.05 percent by weight as specified in 10 CFR 40.13(a).
 - Dose to the public and workers is very low (a few mrem or less)
- HON provided NRC with documentation to support its determination
 - HON relies on same pond characterization as that previously was reviewed by the NRC; no new information on pond materials
 - Demonstrates that the materials satisfy waste acceptance criteria for USEI
 - Includes dose assessment using USEI's NRC-Approved *Site Specific Dose Assessment Methodology* (transportation and disposal)

Using Same Process As Pond A

- No NRC approval is required
 - NRC may perform a technical review as for prior UIQ submittals
 - But, as with prior UIQ submittals, there is no NRC approval and therefore no environmental review
- Pond A Letter to NRC (dated June 5, 2000):
 - “The calcium fluoride stored within this surface impoundment contains source material at an average concentration of 430 PPM (291.1 pCi/gm).”
 - “We would like to ship this material (approximately 167,000 ft³) for burial at Waste Control Specialist under 10 CFR Part 40.13, “Unimportant Quantities of Source Material”.”
- NRC Response (dated September 12, 2000):
 - “Since the calcium fluoride waste contains source material under 0.05 percent by weight as specified in 10 CFR 40.13(a), and the disposal of the material would not result in a dose to the public exceeding 25 mrem/yr, no additional NRC action is required for the transfer of this material for disposal at WCS.”

RCRA Permitting and NRC Decommissioning

- Ponds B, C, D, and E currently managed in accordance with:
 - RCRA Permit issued by the Illinois EPA, and
 - Waiver of the minimum technology requirements (MTR Waiver) for hazardous waste impoundments issued by the USEPA
- Pond areas subject to IEPA/EPA remediation requirements, including financial assurance
 - The RCRA Permit and MTR Waiver currently require that HON close Ponds B, C, D, and E by 2020.
 - To comply with the closure deadline, HON must remove the material in a timely manner

After RCRA Closure?

- After the ponds are closed per the RCRA permit, the pond areas will remain within the site boundary and be subject to ongoing NRC oversight
- HON is not proposing to decommission and terminate the license for the pond areas at this time
- Pond areas will be included in the next NRC decommissioning cost estimate
- HON intends to terminate the NRC license for the pond areas at the same time as it completes decommissioning and license termination for the MTW site