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October 8, 2018

UPS/Next Day Air

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
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 REQUESTED REVISIONS TO CURRENT LICENSE CONDITIONS

On February 9, 2017 Honeywell Metropolis Works submitted to the USNRC an application for renewal of USNRC Source Materials License SUB-526. Enclosed with this letter is a requested revision to the current license conditions (LC). These requests are based on phone calls held with the NRC on March 7, 2018, August 2, 2018, and September 13, 2018. Also included is a justification for removing, revising, or retaining each LC. Honeywell also proposes additional LC's based on the phone conversations with the NRC Staff.

We hope that you find the enclosed materials to be complete and that our responses are helpful in furthering your review of Honeywell's License Renewal Application. 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 – Honeywell MTW Requested Revisions to Existing License Conditions

Cc: Region II, US Nuclear Regulatory Commission  
Attn: Tilda Liu  
245 Peachtree Center Ave., NE, Suite 1200  
Atlanta, GA 30303-1257

NM5520

## Enclosure 1 – Honeywell Revisions to Existing License Conditions

## Honeywell MTW Revisions to Existing License Conditions

License Condition	Request to Retain or Remove	Justification
1. Name of Facility: Honeywell	Retain	The name has not changed.
2. Address of Facility: P.O. Box 430, Metropolis, Illinois 62960	Retain	The address has not changed.
3. License Number: SUB-526, Amendment 12	Retain	Honeywell requests to remove reference to Amendment 12, as this will be a new license.
4. Expiration Date: May 11, 2017		Honeywell is currently in timely renewal.
5. Docket Number: 40-3392	Retain	The Docket Number remains the same.
6. Byproduct, Source, and/or Special Nuclear Material		
A. Natural Uranium	Retain	Honeywell will continue to receive this material on site.
B. Depleted Uranium	Retain	Honeywell requests to retain this LC.
C. Cs-137	Retain	Honeywell will continue to use these sources for calibration purposes.

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License Condition	Request to Retain or Remove	Justification
D. Cs-137	Remove	The Ronan Gauges were removed from the site and transferred to a licensed gauge manufacturer as of 11-5-2009. Honeywell requests that this License Condition (LC) be removed. Honeywell has other gauges which are licensed by the State of Illinois Emergency Management Agency (IEMA) under registration number – 9257953.
E. Any licensed material between Atomic numbers 1 – 100	Revise and Retain	Honeywell proposes to revise this LC to “Any Licensed Material between Atomic Numbers 3 – 83”. Honeywell will continue to use these sources for calibration purposes.
(Proposed F.) Any Licensed Material with Atomic numbers 84 – 95	Proposed new LC	Honeywell proposes to add this new LC. Honeywell will continue to use these sources for calibration purposes.
7. Chemical and/or Physical Form		
A. Yellow Cake, U3O8, UO2, UF4, UF6, chemical intermediates of these Compounds, and sealed and unsealed sources.	Retain	Honeywell will continue to receive this material on site.
B. U3O8, UO2, UF4, and UF6	Retain	Honeywell requests to retain this LC.
C. Sealed Sources	Retain	Honeywell will continue to use these sources for calibration purposes.

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License Condition	Request to Retain or Remove	Justification
D. Sealed Source Ronan Engineering Company Model SA 1 Source holder, Source Model CDC 700	Remove	The Ronan Gauges were removed from the site and transferred to a licensed gauge manufacturer as of 11-5-2009. Honeywell requests that this License Condition (LC) be removed. Honeywell has other gauges which are licensed by the State of Illinois Emergency Management Agency (IEMA) under registration number – 9257953.
E. Any Form	Retain	Honeywell will continue to use these sources for calibration purposes.
(Proposed F.) Any Form	Proposed new LC	Honeywell will continue to use these sources for calibration purposes.
8. Maximum Amount that Licensee may possess at any one time under this license		
A. 68 Million kilograms (150 Million Pounds)	Retain	Honeywell will continue to receive this material on site.
B. 68 kg (150 lbs.)	Retain	Honeywell requests to retain this LC.
C. 300 mCi	Retain	Honeywell will continue to use these sources for calibration purposes.

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License Condition	Request to Retain or Remove	Justification
D. No single source to exceed the maximum activity specified in the registration issued by US NRC Commission of an Agreement State	Remove	The Ronan Gauges were removed from the site and transferred to a licensed gauge manufacturer as of 11-5-2009. Honeywell requests that this License Condition (LC) be removed. Honeywell has other gauges which are licensed by the State of Illinois Emergency Management Agency (IEMA) under registration number – 9257953.
E. 2 mCi	Retain	Honeywell will continue to use these sources for calibration purposes.
(Proposed F.) 1 Micro Curie	Proposed new LC	Honeywell will continue to use these sources for calibration purposes.
9. Licensed material described in 7-D above is to be used, for measurement level, in fixed gauging devices that have been registered either with the U.S. Nuclear Regulatory Commission (NRC) under Title 10 of the <i>Code of Federal Regulations</i> (10 CFR) 32.210 or with an Agreement State, and have been distributed in accordance with a Commission or Agreement State specific license authorizing distribution to persons specifically authorized by a Commission or Agreement State license to receive, possess, and use the devices.	Remove	The Ronan Gauges were removed from the site and transferred to a licensed gauge manufacturer as of 11-5-2009. Honeywell requests that this License Condition (LC) be removed. Honeywell has other gauges which are licensed by the State of Illinois Emergency Management Agency (IEMA) under registration number – 9257953.

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License Condition	Request to Retain or Remove	Justification
10. Licensed material as defined in LC-6, D, and E shall be used by, or under the supervision of, individuals who have received the training described in the letter dated December 27, 2006. The licensee shall maintain records of individuals designated as users for three (3) years following the last use of licensed material by the individual	Revise and Retain	Honeywell requests to remove reference to LC-6 D and leave LC – 6E and proposed new LC 6F  The Ronan Gauges were removed from the site and transferred to a licensed gauge manufacturer as of 11-5-2009. Honeywell requests that this License Condition (LC) be revised and retained.
11. The Health Physics Supervisor for this license shall carry out the duties and responsibilities with regards to fixed gauging devices described in Appendix F of NUREG-1556, Volume 4.	Remove	The Ronan Gauges were removed from the site and transferred to a licensed gauge manufacturer as of 11-5-2009. Honeywell requests that this License Condition (LC) be removed.
12.	Remove LC 12 and all subsections	The Ronan Gauges were removed from the site and transferred to a licensed gauge manufacturer as of 11-5-2009. Honeywell requests that this License Condition (LC) be removed.
A. Sealed sources shall be tested for leakage and/or contamination except as specified in Paragraphs D and E below, and at intervals not to exceed the intervals specified in the certificate of registration issued by the NRC under 10 CFR 32.210 or by an Agreement State.	Remove	The Ronan Gauges were removed from the site and transferred to a licensed gauge manufacturer as of 11-5-2009. Honeywell requests that this LC be removed.
B. Notwithstanding Paragraph A of this condition, sealed sources designed to primarily emit alpha particles shall be tested for leakage and/or contamination at intervals not to exceed three (3) months.	Remove	The Ronan Gauges were removed from the site and transferred to a licensed gauge manufacturer as of 11-5-2009. Honeywell requests that this LC be removed.

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License Condition	Request to Retain or Remove	Justification
<p>C. In the absence of a certificate from a transferor indicating that a leak test has been made within the intervals specified in the certificate of registration issued by the NRC under 10 CFR 32.210 or by an Agreement State, prior to the transfer, a sealed source received from another person shall not be put into use until tested and the test results received</p>	Remove	The Ronan Gauges were removed from the site and transferred to a licensed gauge manufacturer as of 11-5-2009. Honeywell requests that this LC be removed.
<p>D. Sealed sources need not be tested if they contain only hydrogen-3, or they contain only a radioactive gas, or the half-life of the isotope is thirty (30) days or less, or they contain not more than 100 microcuries of beta and/or gamma emitting material, or not more than 10 microcuries of alpha emitting material.</p>	Remove	The Ronan Gauges were removed from the site and transferred to a licensed gauge manufacturer as of 11-5-2009. Honeywell requests that this LC be removed.
<p>E. Sealed sources need not be tested if they are in storage and are not being used. However, when they are removed from storage for use or transferred to another person, and have not been tested within the required leak test interval, they shall be tested before use or transfer. No sealed source shall be stored for a period of more than ten (10) years without being tested for leakage and/or contamination.</p>	Remove	The Ronan Gauges were removed from the site and transferred to a licensed gauge manufacturer as of 11-5-2009. Honeywell requests that this LC be removed.

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<p>F. The leak test shall be capable of detecting the presence of 0.005 microcurie of radioactive material on the test sample. If the test reveals the presence of 0.005 microcurie or more of removable contamination, a report shall be filed with the NRC in accordance with 10 CFR 30.50(b)(2), and the source shall be removed immediately from service and decontaminated, repaired, or disposed of in accordance with Commission regulations. The report shall be filed within five (5) days of the date the leak test result is known with the appropriate NRC Regional Office, referenced in Appendix D of 10 CFR Part 20. The report shall specify the source involved, the test results, and corrective action taken.</p>	Remove	The Ronan Gauges were removed from the site and transferred to a licensed gauge manufacturer as of 11-5-2009. Honeywell requests that this LC be removed.
<p>G. Tests for leakage and/or contamination, including leak test sample collection and analysis, shall be performed by the licensee or other persons specifically licensed by the NRC or an Agreement State to perform such services.</p>	Remove	The Ronan Gauges were removed from the site and transferred to a licensed gauge manufacturer as of 11-5-2009. Honeywell requests that this LC be removed.
<p>H. Records of leak test results shall be kept in units of microcuries and shall be maintained for five (5) years.</p>	Remove	The Ronan Gauges were removed from the site and transferred to a licensed gauge manufacturer as of 11-5-2009. Honeywell requests that this LC be removed.
<p>13. Sealed sources containing licensed material shall not be opened or sources removed from source holders by the licensee, except as specifically authorized by license from the NRC or an Agreement State</p>	Remove	The Ronan Gauges were removed from the site and transferred to a licensed gauge manufacturer as of 11-5-2009. Honeywell requests that this LC be removed.

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License Condition	Request to Retain or Remove	Justification
<p>14. The licensee shall conduct a physical inventory every six (6) months, or at other intervals approved by the NRC, to account for all sources and/or devices received and possessed under the license. Records of inventories shall be maintained for five (5) years from the date of each inventory and shall include the radionuclides, quantities, manufacturer's name and model numbers, and the date of the inventory.</p>	Remove	The Ronan Gauges were removed from the site and transferred to a licensed gauge manufacturer as of 11-5-2009. Honeywell requests that this LC be removed.
<p>A. Each gauge shall be tested for the proper operation of the on-off mechanism (shutter) and indicator, if any, at intervals not to exceed six (6) months; or at such longer intervals as specified in the certificate of registration issued by the NRC pursuant to 10 CFR 32.210 or the equivalent regulations of an Agreement State.</p>	Remove	The Ronan Gauges were removed from the site and transferred to a licensed gauge manufacturer as of 11-5-2009. Honeywell requests that this LC be removed.
<p>B. Gauges that are stored, not being used, and have the shutter lock mechanism in a locked position, are exempted from this periodic test. However, they shall be tested before use.</p>	Remove	The Ronan Gauges were removed from the site and transferred to a licensed gauge manufacturer as of 11-5-2009. Honeywell requests that this LC be removed.
<p>C. The following services shall not be performed by the licensee: installation, initial radiation surveys, relocation, removal from service, dismantling, alignment, replacement, or disposal of the sealed source and non-routine maintenance or repair of components related to the radiological safety of the gauge (i.e., the sealed source, the source holder, source drive mechanism, on-off mechanism [shutter], shutter control, shielding). These services shall be performed only by persons specifically licensed by the NRC or an Agreement State to perform such services.</p>	Remove	The Ronan Gauges were removed from the site and transferred to a licensed gauge manufacturer as of 11-5-2009. Honeywell requests that this LC be removed.

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License Condition	Request to Retain or Remove	Justification
15. The licensee may initially mount a gauge if permitted by the certificate of registration issued by the NRC or an Agreement State and under the following conditions:	Remove	The Ronan Gauges were removed from the site and transferred to a licensed gauge manufacturer as of 11-5-2009. Honeywell requests that this LC be removed.
A. the gauge must be mounted in accordance with written instructions provided by the manufacturer;	Remove	The Ronan Gauges were removed from the site and transferred to a licensed gauge manufacturer as of 11-5-2009. Honeywell requests that this LC be removed.
B. the gauge must be mounted in a location compatible with the "Conditions of Normal Use," and "Limitations and/or Other Considerations of Use," in the certificate of registration issued by the Commission or an Agreement State;	Remove	The Ronan Gauges were removed from the site and transferred to a licensed gauge manufacturer as of 11-5-2009. Honeywell requests that this LC be removed.
C. the on-off mechanism (shutter) must be locked in the off position, if applicable, or the source must be otherwise fully shielded;	Remove	The Ronan Gauges were removed from the site and transferred to a licensed gauge manufacturer as of 11-5-2009. Honeywell requests that this LC be removed.
D. the gauge must be received in good condition (i.e., package was not damaged); and;	Remove	The Ronan Gauges were removed from the site and transferred to a licensed gauge manufacturer as of 11-5-2009. Honeywell requests that this LC be removed.
E. the gauge must not require any modification to fit in the proposed location.	Remove	The Ronan Gauges were removed from the site and transferred to a licensed gauge manufacturer as of 11-5-2009. Honeywell requests that this LC be removed.

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License Condition	Request to Retain or Remove	Justification
16. Mounting does not include electrical connection, activation or operation of the gauge. The source must remain fully shielded, and the gauge may not be used until it is installed and made operational by a person specifically licensed by the NRC or an Agreement State to perform such operations.	Remove	The Ronan Gauges were removed from the site and transferred to a licensed gauge manufacturer as of 11-5-2009. Honeywell requests that this LC be removed.
A. The licensee may maintain, repair, or replace device components that are not related to the radiological safety of the device containing byproduct material and that do not result in the potential for any portion of the body to come into contact with the primary beam or in increased radiation levels in accessible areas.	Remove	The Ronan Gauges were removed from the site and transferred to a licensed gauge manufacturer as of 11-5-2009. Honeywell requests that this LC be removed.
B. The licensee may not maintain, repair, or replace any of the following device components: the sealed source; the source holder; source drive mechanism; on-off mechanism (shutter); shutter control; or shielding; or any other component related to the radiological safety of the device, except as provided otherwise by specific condition of this license.	Remove	The Ronan Gauges were removed from the site and transferred to a licensed gauge manufacturer as of 11-5-2009. Honeywell requests that this LC be removed.
C. Prior to initial use and after installation, relocation, dismantling, alignment, or any other activity involving the source or removal of the shielding, the licensee shall assure that a radiological survey is performed to determine radiation levels in accessible areas around, above, and below the gauge with the shutter open. This survey shall only be performed by persons authorized to perform such services by the NRC or an Agreement State.	Remove	The Ronan Gauges were removed from the site and transferred to a licensed gauge manufacturer as of 11-5-2009. Honeywell requests that this LC be removed.

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License Condition	Request to Retain or Remove	Justification
D. The licensee shall operate each device containing licensed material within the manufacturer's specified temperature and environmental limits such that the shielding and shutter mechanism of the source holder are not compromised.	Remove	The Ronan Gauges were removed from the site and transferred to a licensed gauge manufacturer as of 11-5-2009. Honeywell requests that this LC be removed.
E. The licensee shall assure that the shutter mechanism of each device is locked in the closed position during periods when a portion of an individual's body may be subject to the direct radiation beam. The licensee shall review and modify, as appropriate, its "lock-out" procedures whenever a new device is obtained to incorporate the device manufacturer's recommendations.	Remove	The Ronan Gauges were removed from the site and transferred to a licensed gauge manufacturer as of 11-5-2009. Honeywell requests that this LC be removed.
17. Authorized place of use: The licensee's existing facilities at Honeywell Metropolis Works, Highway 45 North, Metropolis, Illinois.	Remove	This has been included in LRA Section 1.1. This is duplicate information that was included in LC 2. Honeywell requests that it be removed.
18. The licensee shall conduct authorized activities at the Honeywell Metropolis Works Facility in accordance with the statements, representations, and conditions in the following documents. Where a document is undated, the respective reference is to the current version of the document. The current version of the document includes any revisions that have been made in accordance with the approved configuration management process as described in License Condition, Item J.	Revise and Retain	Honeywell requests the replacement of reference to LC item J with "in section 11.1 of the License Application".

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License Condition	Request to Retain or Remove	Justification
A. License Application dated May 12, 2006, as supplemented by letters dated March 20, 2007, May 12, 2008, July 12, 2010, February 15, 2011 September 7, 2017 and November 9, 2017;	Revise and Retain	Honeywell requests to revise and retain this LC with the applicable date of the License Application.
B. Safety Demonstration Report;	Remove	Honeywell has submitted a one-part LRA consistent with NUREG 1520 in which the Integrated Safety Analysis (ISA) Summary replaces the Safety Demonstration Report. Honeywell requests that this LC be removed.
C. Emergency Response Plan (ERP);	Retain	Honeywell has included this LC in section 8.1 of the LRA. Honeywell requests to retain this LC.
D. Integrated Safety Analysis (ISA) Summary;	Retain	Honeywell has included this LC in section 3.0 of the LRA. Honeywell requests to retain this LC.
E. Site reclamation Cost Estimate for Metropolis Plant;	Revise and Retain	This LC has been included in section 10 of the LRA and it is referred to as the Decommissioning Funding Plan. Honeywell requests that this LC be revised and retained.
F. Amendment request dated December 27, 2006, to possess and use sealed sources;	Remove	The Ronan Gauges were removed from the site and transferred to a licensed gauge manufacturer as of 11-5-2009. Honeywell requests that this License Condition (LC) be removed.

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License Condition	Request to Retain or Remove	Justification
G. [Deleted]		
H. Amendment Request dated July 17, 2008, as supplemented by letters dated October 1, 2008, and December 3, 2008, regarding new process for filling small UF <sub>6</sub> cylinders;	Retain	Honeywell requests to retain this LC because it is needed for plant operations.
I. Amendment Request dated March 27, 2009, as supplemented by letters dated May 11 and July 21, 2009, regarding changes to the facility's surface contamination levels;	Remove	This LC has been incorporated into Table 4-1 of the LRA. Honeywell requests to remove this LC.
J. Amendment Request dated July 12, 2010 and supplemented on February 15, 2011, regarding process description of the facility's configuration control system; and	Remove	This LC has been incorporated into the LRA section 11.1.3. Honeywell requests to remove this LC.
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.	Retain	After further discussion with the NRC staff and following internal deliberations, Honeywell submitted a letter dated 6/7/2018 to withdraw the request for the removal of LC-30. The NRC acknowledged the receipt of this letter on 6/14/2018. Honeywell requests to retain this LC.
L. Exemption Request dated September 7, 2017, as supplemented by letter dated November 9, 2017, regarding an exemption from the reporting requirements in 10 CFR 40.60(b)(3), discussed in Condition 31 below.	Remove	Honeywell requests to remove this LC because it is listed in Section 1.8.1 of the LRA.

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License Condition	Request to Retain or Remove	Justification
M. Amendment Request dated February 12, 2018 as supplemented by letter dated March 16, 2018, regarding physical security modification to Vehicle Barrier System to facilitate removal of pond material.	Retain	Honeywell requests that this LC be retained
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.	Remove	The listed elements of this LC were fully implemented within 180 days of the last license renewal in 2007. Honeywell requests that this LC be removed.
20. For changes to the site, structures, 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 the 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.	Remove	This license condition has been incorporated into Section 3.5 of the LRA. Honeywell requests that this LC be removed.
21. Honeywell shall, within 10 days of receipt of source material, report to the Nuclear Materials Management Safeguards System's database, the shipper's values of the natural uranium. Shipper's values shall be reported (Blocks 1 through 27s of DOE/NRC Form 741) as required in Section 2.1.1 of NUREG/BR-0006. The final quantity determination, as agreed upon with the supplier, shall be reported to the NMMSS database within 10 days of the date on which the agreement is finalized.	Retain	This LC has been incorporated into Section 12.1 of the LRA. Honeywell requests that this LC be retained.

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License Condition	Request to Retain or Remove	Justification
22. The licensee is hereby granted an exemption from the requirements of 10 CFR 20.1902 (a) and 10 CFR 20.1904(a), as described in Section 1.7.1 of its License Renewal Application.	Remove	Honeywell requests to remove this LC because it is included in Section 1.8.1 of the LRA.
23. The average concentration of uranium in calcium fluoride released to each commercial organization, for any consecutive 12-month period, shall not exceed 212 pCi/gram.	Remove	This amendment was requested on 7/30/1993 and approved by the NRC on 8/26/1993. This LC was incorporated into the LRA Section 9.2.2.1, Liquid Wastes. Honeywell requests that this LC be removed.
24. The licensee shall maintain and execute the response measures in the ERP. Any changes to the ERP are subject to the 10 CFR 40.35(f) requirements.	Remove	This was incorporated into Section 8.1 of the LRA. Honeywell requests to remove this LC.
25. At intervals, not to exceed 3 years, the licensee must submit, for NRC review, an updated cost estimate for decommissioning. After resolution of any NRC comments on the estimate, a signed original of the financial instrument reflecting an amount sufficient to cover the approved cost estimate must be provided to the NRC.	Remove	This is now a requirement of 10 CFR 40.36. This was incorporated into Section 10.1 of the LRA. Honeywell requests that this LC be removed.
26. [Deleted]		
27. [Deleted]		
28. Notwithstanding, the Derived Air Concentration (DAC) and Annual Limit on Intake (ALI) listed in Appendix B to 10 CFR Part 20, the licensee may use adjusted DAC values and adjusted ALI values listed in International Commission on Radiological Protection (ICRP) Publication 68 (Annals of the ICRP, Volume 24, No. 4).	Remove	Honeywell requests to remove this LC because it was included in Section 1.8.1 of the LRA.

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License Condition	Request to Retain or Remove	Justification
29. Notwithstanding, the organ dose weighting factors in 10 CFR Part 20.1003, the licensee may use the tissue weighting factors listed in ICRP Publication 60 (Annals of the ICRP, Volume 21, No. 1-3) for effective dose assessments listed in ICRP Publication 68 methodologies.	Remove	Honeywell requests to remove this LC because it was included in Section 1.8.1 of the LRA.
30. Before proceeding with implementation of the pond closure actions proposed in the license amendment request 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.	Retain	After further discussion with the NRC staff and following internal deliberations, Honeywell submitted a letter dated 6/7/2018 to withdraw the request for the removal of LC-30. The NRC acknowledged the receipt of this letter on 6/14/2018. This will be addressed later. Honeywell requests to retain this LC.
31. Notwithstanding the requirements of 10 CFR 40.60(b)(3), the licensee is granted an exemption from the requirement to notify the NRC within 24 hours of an unplanned medical treatment of an individual with spreadable contamination on the individual's clothing or body at the onsite medical facility. The licensee commits to maintain a log of contaminated workers treated at the onsite medical facility and provide the information for NRC inspection upon request.	Remove	Honeywell requests to remove this LC because it has been included in Section 1.8.1 of the LRA.

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License Condition	Request to Retain or Remove	Justification
<p>32. Honeywell shall notify the NRC within 30 days of the announcement to resume full operations. The site shall implement an Emergency Response Plan (ERP) that is equivalent to Revision 9 of the document prior to the production of UF6.</p>	<p>Proposed – New LC</p>	<p>Per 10 CFR 40.35(f), "the licensee may change the plan without Commission approval, if the changes do not decrease the effectiveness of the plan." These ERP changes were evaluated using Honeywell's configuration management process as not requiring prior NRC approval because they do not decrease the effectiveness of the Plan. This new LC will provide the NRC assurances that MTW shall not start UF6 production without an effective ERP in place.</p>
<p>33. Honeywell shall maintain a security program in accordance with Compensatory Safeguards Measures Order (EA 02-025) dated March 25, 2002 as approved and amended.</p>	<p>Proposed – New LC</p>	<p>The licensee requests a new LC as reference to the Compensatory Safeguards Measures Order (EA 02-025)</p>