

## Summary of Items Discussed on March 27 and 28, 2019 Between the U.S. Nuclear Regulatory Commission and Honeywell Metropolis Works Staff

1. License Conditions Cleanup (LCs) - There was a discussion of the clean-up of LCs from the current license to be implemented through license renewal. Honeywell had submitted on October 8, 2018, a document which included Honeywell's positions with regard to dispositioning the current LCs into the license renewal. Some of the more significant conditions discussed were:
  - a. Deletion of LC's related to Ronan Gauges which are no longer used.
  - b. Revisions to LC 18:
    - i. Remove date references to License Application (LA) to reflect approved change process.
    - ii. Deletion of Safety Demonstration Report (SDR):
      1. Honeywell will evaluate whether key commitments from the SDR were adequately moved to the LA. Additionally, Honeywell will confirm that the appropriate Sections of the SDR were included in the Integrated Safety Analyses (ISAs).
    - iii. Pulling out the ISAs from LC 18 and placing it in a separate LC with a different preamble (see discussion related to change process in item 4 below).
    - iv. Integration of Item 18H (amendment related to filling small cylinders) into the LA.
    - v. Keep reference to exemption requests:
      1. Will add back references to exemption requests.
      2. Revise LC's to make sure it is clear which conditions are exemptions.
2. Commitments in Documents:
  - a. Items that are considered to be commitments will be identified in the LA (moved from ISAs).
  - b. Language consistency between LA and ISAs.
  - c. Verify that commitments from SDR moved to LA.
  - d. LA will be clarified to indicate commitments and descriptions.
3. ISA Summary:
  - a. Details about methodology and other items that could be considered commitments will be moved to the LA.
  - b. LC 20 will be modified/clarified:
    - i. Refer to the appropriate change process prior approval questions for an ISAs as derived from Regulatory Guide 3.74. The criteria will either be specified in the LC or included in Section 11.1 of the LA.

4. Change Process for LA:
  - a. LC will be modified to clarify that a summary of changes needs to be prepared and submitted for the LA specifically.
  - b. Refer to the appropriate change process prior approval questions for a LA as derived from RG 3.74. The criteria will either be specified in the LC or included in Section 11.1 of the LA.
5. Draft Request Additional Information (RAI) Responses:
  - a. RAI A:
    - i. Honeywell will agree to look at the identified scenarios and propose additional LC's to assure that they will be evaluated prior to performing the identified operations.
    - ii. For the events that were identified, Honeywell will provide a commitment to look at those systems using their ISA process. Honeywell also believes that not all of the events identified will result in the need to perform additional ISA analyses.
  - b. RAI B

Safety features identified in the SDR will remain in the ISAs. Any removal of safety features will be based on changes made through use of Honeywell's configuration management process. Additional ISA Analysis may not be required if the items have already evaluated the sequences and they were low consequence.
  - c. RAI C

Honeywell wants to have additional discussion with the NRC fire staff regarding the use of National Fire Protection Association 2 for the liquid hydrogen storage tanks. Based on follow-up discussion, the RAI was deleted. Honeywell will provide additional description of the use of the deep well pump as the primary fire water source. They will also clarify the words in Chapter 7 to include a discussion that the fire water tank is only needed in the event of both a fire and a power outage and that they supply piping is independent.
  - d. RAI D

Honeywell stated that the 21 accident sequences from the ISA used unmitigated consequences.
  - e. RAI E

Honeywell will clarify the language in the LA and ISAs related to fire related accident sequences.
6. Unimportant Quantities Request and LC 30:
  - a. Honeywell stated that their intent in submitting the information related to unimportant quantities was to notify the NRC and that they did not believe the NRC needed to review the information and provide approval. Honeywell plans on shipping the first railcar of this material to US Ecology by the end of April 2019.

- i. NRC staff said they would look into the statements made by Honeywell in the submittal indicating that they were notifying the NRC of its intent to remove the material and the staff determination of a need for a review.
  - b. LC 30 – Based on a change of plans, Honeywell will request deletion of LC on previous decommissioning path. The rationale will be explained and it will be integrated into the revisions that are being prepared as part of the renewal completion.
- 7. Scheduling:
  - a. Honeywell estimates that it will be able to prepare the revised LA/ISAs documents by the end of June 2019. The current schedule to complete the Environmental Assessment is September 2019. The NRC staff will look into accelerating this schedule.