

Honeywell

THE POWER OF **CONNECTED**

Performance Materials & Technologies

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July 16, 2019

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 REQUEST NRC TO WITHDRAW
LICENSE CONDITION 30**

By letter dated December 2, 2010 (Agencywide Documents Access and Management System [ADAMS] Accession No. ML103400456), and as supplemented by letters dated February 25, 2011 (ADAMS Accession No. ML110620251), and March 4, 2011 (ADAMS Accession No. ML110750234), Honeywell submitted a license amendment request (LAR) regarding its proposed Surface Impoundment Decommissioning Plan to the U.S. Nuclear Regulatory Commission (NRC). Specifically, Honeywell was seeking to decommission four surface impoundments (i.e., retention ponds) at the Honeywell Metropolis Works site and release the ponds from its Materials License for unrestricted use under Section 20.1402 of Title 10 of the *Code of Federal Regulations* (10 CFR).

The staff completed the review of the LAR and found the proposed actions acceptable with the addition of a License Condition. The following License Condition (LC), LC-30, was added to Honeywell's Material License, SUB-526.

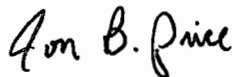
LC-30 – Before proceeding with implementation of the pond closure actions proposed in the LAR dated December 2, 2010, and as supplemented by letters dated February 25, 2011, and March 4, 2011, Honeywell shall obtain additional samples and isotopic analyses of pond material from each of the four ponds 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

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with all federal and state laws and regulations governing the ponds.

Honeywell has decided to remove the materials from Ponds B, C, D, E and dispose of the material off-site vs leaving the material in place as requested in our original license amendment request that resulted in LC-30. Honeywell will excavate the material from the ponds and place the material in disposal bags, the bags are placed inside of a gondola rail car and transported to a licensed off-site facility for disposal. Post pond remediation soil sampling of the area will be performed and the area will be included in the next Decommissioning Cost Estimate. Based on the information above, and per discussions with NRC staff on March 28, 2019 Honeywell requests NRC to withdraw LC-30 from the MTW License. If you have questions or comments regarding this submittal, please contact Mr. Sean Patterson, Regulatory Affairs Manager, at (618) 524-6341.

Sincerely,



Jon Price
Acting Plant Manager

Cc: US Nuclear Regulatory Commission
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