

# Honeywell

THE POWER OF **CONNECTED**

Performance Materials and Technologies  
2788 North U.S. 45 Road  
P O Box 430  
Metropolis, IL 62960  
www.honeywell.com

April 30, 2021

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

Reference:

- 1) Docket No. 40-3392; License SUB-526, Amendment 14
- 2) NRC Regulation 10 CFR 40.14 "Specific Exemptions"

Subject: Honeywell Metropolis Works License Amendment Request to Grant Exemption from the 24-Hour Reporting Requirement of 10 CFR 40.60 (b)(1) for Unplanned Contamination Events.

Dear Sir or Madam:

Honeywell Metropolis Works (MTW) hereby requests an amendment to its Material License SUB-526. This amendment will grant the licensee exemption, in part, to 10 CFR 40.60 (b)(1) reporting requirement stating:

"(b) *Twenty-four-hour report.* Each licensee shall notify the NRC within 24 hours after the discovery of any of the following events involving licensed material:

(1) An unplanned contamination event that:

- i. Requires access to the contaminated area, by workers or the public, to be restricted for more than 24 hours by imposing additional radiological controls or by prohibiting entry into the area;
- ii. Involves a quantity of material greater than five times the lowest annual limit on intake specified in appendix B of 20.1001 – 20.2401 of 10 CFR 20 for the material; and
- iii. Has access to the area restricted for a reason other than to allow isotopes with a half-life of less than 24 hours to decay prior to decontamination.

Honeywell proposes that the granted exemption be documented in the following new License Condition (LC):

NM552D  
NM55

LC-XX – Notwithstanding the requirements of 10 CFR 40.60(b)(1), the licensee is exempted from the requirement to report unplanned contamination events when the following conditions are met:

1. The event occurs in the restricted area in a building which is maintained inaccessible to the public by multiple access controls,
2. The area was controlled for contamination before the event occurred, the release of radioactive material is under control, and no contamination has spread outside the area,
3. Radiation safety personnel trained in contamination control are readily available,
4. Equipment and facilities that may be needed for contamination control are readily available, and
5. The otherwise reportable unplanned contamination event is documented in the licensee's Corrective Action Program.

The licensee commits to 1) Continuing to maintain the posting of the Restricted Area (RA) which is not accessible to the public, 2) Impose controls as necessary to keep radiation exposures and releases as low as reasonably achievable, 3) Ensure radiation protection personnel are trained and qualified in contamination control and are readily available, 4) Provide equipment and facilities that may be needed for contamination control, 5) Perform radiation surveys of unplanned contamination events in restricted area and provide records for NRC inspection upon request, 6) Train unescorted workers in the restricted area on methods to reduce radiation exposures including contamination controls and response actions for abnormal or upset conditions.

Attached to this letter is NRC Form 313 – “Application for Materials License” and the technical justification for the 10 CFR 40.60 (b)(1) exemption request.

If you have any questions on the submitted information or other issues associated with the Honeywell Metropolis Works license amendment request, please contact Mr. Sean Patterson, Regulatory Affairs Manager, at (618) 524-6341.

Sincerely,



Brian Hunt  
Plant Manager

Enclosure

Cc: Attn: David Titinsky  
US Nuclear Regulatory Commission  
11555 Rockville Pike  
Rockville, MD 20852



**APPLICATION FOR  
 MATERIALS LICENSE**

APPROVED BY OMB: NO. 3150-0120

EXPIRES: 01/31/2023

Estimated burden per response to comply with this mandatory collection request 43 hours. Submittal of the application is necessary to determine that the applicant is qualified and that adequate procedures exist to protect the public health and safety. Send comments regarding burden estimate to the Information Services Branch (T-6 A10M), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by e-mail to [InfoCollects.Resource@nrc.gov](mailto:InfoCollects.Resource@nrc.gov), and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0120), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

INSTRUCTIONS: SEE THE CURRENT VOLUMES OF THE NUREG-1666 TECHNICAL REPORT SERIES ("CONSOLIDATED GUIDANCE ABOUT MATERIALS LICENSES") FOR DETAILED INSTRUCTIONS FOR COMPLETING THIS FORM: <http://www.nrc.gov/reading-rm/doc-collections/nureg/staff/r1666/>. SEND TWO COPIES OF THE COMPLETED APPLICATION TO THE NRC OFFICE SPECIFIED BELOW.

APPLICATION FOR DISTRIBUTION OF EXEMPT PRODUCTS FILE APPLICATIONS WITH:  
 MATERIALS SAFETY LICENSING BRANCH  
 DIVISION OF MATERIAL SAFETY, STATE, TRIBAL AND RULEMAKING PROGRAMS  
 OFFICE OF NUCLEAR MATERIALS SAFETY AND SAFEGUARDS  
 U.S. NUCLEAR REGULATORY COMMISSION  
 WASHINGTON, DC 20555-0001

ALL OTHER PERSONS FILE APPLICATIONS AS FOLLOWS:

IF YOU ARE LOCATED IN:

ALABAMA, CONNECTICUT, DELAWARE, DISTRICT OF COLUMBIA, FLORIDA, GEORGIA, KENTUCKY, MAINE, MARYLAND, MASSACHUSETTS, NEW HAMPSHIRE, NEW JERSEY, NEW YORK, NORTH CAROLINA, PENNSYLVANIA, PUERTO RICO, RHODE ISLAND, SOUTH CAROLINA, TENNESSEE, VERMONT, VIRGINIA, VIRGIN ISLANDS, OR WEST VIRGINIA,

SEND APPLICATIONS TO:

LICENSING ASSISTANCE TEAM  
 DIVISION OF NUCLEAR MATERIALS SAFETY  
 U.S. NUCLEAR REGULATORY COMMISSION, REGION I  
 2100 RENAISSANCE BOULEVARD, SUITE 100  
 KING OF PRUSSIA, PA 19406-2713

IF YOU ARE LOCATED IN:

ILLINOIS, INDIANA, IOWA, MICHIGAN, MINNESOTA, MISSOURI, OHIO, OR WISCONSIN, SEND APPLICATIONS TO:

MATERIALS LICENSING BRANCH  
 U.S. NUCLEAR REGULATORY COMMISSION, REGION III  
 2443 WARRENVILLE ROAD, SUITE 210  
 LISLE, IL 60632-4362

IF YOU ARE LOCATED IN:

ALASKA, ARIZONA, ARKANSAS, CALIFORNIA, COLORADO, HAWAII, IDAHO, KANSAS, LOUISIANA, MISSISSIPPI, MONTANA, NEBRASKA, NEVADA, NEW MEXICO, NORTH DAKOTA, OKLAHOMA, OREGON, PACIFIC TRUST TERRITORIES, SOUTH DAKOTA, TEXAS, UTAH, WASHINGTON, OR WYOMING,

SEND APPLICATIONS TO:

NUCLEAR MATERIALS LICENSING BRANCH  
 U.S. NUCLEAR REGULATORY COMMISSION, REGION IV  
 1600 E. LAMAR BOULEVARD  
 ARLINGTON, TX 78011-4511

PERSONS LOCATED IN AGREEMENT STATES SEND APPLICATIONS TO THE U.S. NUCLEAR REGULATORY COMMISSION ONLY IF THEY WISH TO POSSESS AND USE LICENSED MATERIAL IN STATES SUBJECT TO U.S. NUCLEAR REGULATORY COMMISSION JURISDICTIONS.

1 THIS IS AN APPLICATION FOR (Check appropriate item)

A NEW LICENSE

B AMENDMENT TO LICENSE NUMBER SUB-526 Doc 40-3392

C RENEWAL OF LICENSE NUMBER \_\_\_\_\_

2 NAME AND MAILING ADDRESS OF APPLICANT (Include zip code)

Honeywell International  
 2768 North US 45 Road  
 PO Box 430  
 Metropolis, IL 62690

3 ADDRESS WHERE LICENSED MATERIALS WILL BE USED OR POSSESSED

2768 North US 45 Road  
 Metropolis, IL 62690

4 NAME OF PERSON TO BE CONTACTED ABOUT THIS APPLICATION

Sean Patterson, Regulatory Affairs Manager

BUSINESS TELEPHONE NUMBER	BUSINESS CELLULAR TELEPHONE NUMBER
618-524-6341	618-645-9012
BUSINESS E-MAIL ADDRESS	
sean.patterson@honeywell.com	

SUBMIT ITEMS 5 THROUGH 11 ON 8-1/2 X 11" PAPER. THE TYPE AND SCOPE OF INFORMATION TO BE PROVIDED IS DESCRIBED IN THE LICENSE APPLICATION GUIDE.

5 RADIOACTIVE MATERIAL

a Element and mass number, b chemical and/or physical form, and c maximum amount which will be possessed at any one time

8 TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS

10 RADIATION SAFETY PROGRAM

6 PURPOSE(S) FOR WHICH LICENSED MATERIAL WILL BE USED

7 INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING AND EXPERIENCE

9 FACILITIES AND EQUIPMENT

11 WASTE MANAGEMENT

12 LICENSE FEES (Fees required only for new applications, with few exceptions\*)  
 (See 10 CFR 170 and Section 170.31)  
 \*Amendments/Renewals that increase the scope of the existing license to a new or higher fee category will require a fee

FEE CATEGORY	AMOUNT ENCLOSED \$

PER THE DEBT COLLECTION IMPROVEMENT ACT OF 1996 (PUBLIC LAW 104-134), YOU ARE REQUIRED TO PROVIDE YOUR TAXPAYER IDENTIFICATION NUMBER. PROVIDE THIS INFORMATION BY COMPLETING NRC FORM 831: <https://www.nrc.gov/reading-rm/doc-collections/forms/nrc831info.html>

13 CERTIFICATION (Must be completed by applicant) THE APPLICANT UNDERSTANDS THAT ALL STATEMENTS AND REPRESENTATIONS MADE IN THIS APPLICATION ARE BINDING UPON THE APPLICANT

THE APPLICANT AND ANY OFFICIAL EXECUTING THIS CERTIFICATION ON BEHALF OF THE APPLICANT, NAMED IN ITEM 2, CERTIFY THAT THIS APPLICATION IS PREPARED IN CONFORMITY WITH TITLE 10, CODE OF FEDERAL REGULATIONS, PARTS 30, 32, 33, 34, 35, 36, 37, 38, AND 40, AND THAT ALL INFORMATION CONTAINED HEREIN IS TRUE AND CORRECT TO THE BEST OF THEIR KNOWLEDGE AND BELIEF

WARNING 18 U.S.C. SECTION 1001 ACT OF JUNE 25, 1948 62 STAT 749 MAKES IT A CRIMINAL OFFENSE TO MAKE A WILLFULLY FALSE STATEMENT OR REPRESENTATION TO ANY DEPARTMENT OR AGENCY OF THE UNITED STATES AS TO ANY MATTER WITHIN ITS JURISDICTION

CERTIFYING OFFICER - TYPED/PRINTED NAME AND TITLE	SIGNATURE	DATE
Bran Hunt, Plant Manager		4/27/21

FOR NRC USE ONLY					
TYPE OF FEE	FEE LOG	FEE CATEGORY	AMOUNT RECEIVED	CHECK NUMBER	COMMENTS
APPROVED BY				DATE	

# **ENCLOSURE**

**TECHNICAL JUSTIFICATION FOR 10 CFR 40.60(b)(1) EXEMPTION  
REQUEST**

## TECHNICAL JUSTIFICATION FOR 10 CFR 40.60(b)(1) EXEMPTION REQUEST

### Exemption Request

Honeywell Metropolis Works (MTW) is the holder of NRC License SUB-526 for a uranium conversion facility located at the Metropolis Illinois site.

MTW is requesting an exemption from the 24-hour reporting requirement in 10 CFR 40.60(b)(1) for situations due to an unplanned contamination event inside the restricted area that requires worker access to the contaminated area to be restricted for more than 24 hours by imposing additional radiological controls or by prohibiting entry into the area.

It should be noted that MTW is not seeking an exemption that would alter reporting requirements in 10 CFR 40.60(b)(1) for situations due to an unplanned contamination event *outside the restricted area*. MTW will continue to notify NRC of an unplanned contamination event outside the restricted area that requires worker access to an area to be restricted for more than 24 hours by imposing additional radiological controls or by prohibiting entry into the area. The exemption would not preclude reporting of unplanned, contamination events by other NRC requirements such as 10 CFR 20.2202 "Notification of Incidents", and 10 CFR 20.2203 "Reports of Exposures, Radiation Levels and Concentrations of Radioactive Material Exceeding the Constraints or Limits".

### Basis for Exemption

Licensed activities at MTW include the chemical conversion of natural uranium ore concentrates into high purity UF<sub>6</sub>. The UF<sub>6</sub> product from the facility is shipped to uranium enrichment plants. Following enrichment, the uranium is typically converted into fuel for use in nuclear power reactors.

The radiological controlled area at the MTW is identified as the Restricted Area (RA) and includes that area within the inner security fence, including the area within the Administration Building that lies within the Security checkpoint. Access to the RA is limited by the fence and Security force monitoring of the entrance points.

Honeywell establishes a Radioactive Material Area congruent with the restricted area and posts all entrance or access points to the Restricted Area with signs bearing the standard radiation trefoil and the words:

**CAUTION  
RADIATION AREA  
RADIOACTIVE MATERIAL  
Any area or container in this plant (or "beyond this point") may contain  
radioactive material**

The terms "entrance or access point" and "restricted area" are used consistent with the definitions provided at 10 CFR 20.1003. This posting practice is consistent with the guidance

provided in Section 7 of Regulatory Guide 8.30, "Health Physics Surveys in Uranium Recovery Facilities."

Honeywell does not post individual rooms or areas as radioactive material areas. The practice of posting individual rooms and areas as radioactive material areas arising from the presence of containers of radioactive material would not be practical, nor would it provide any significant improvement in the state of radiation safety. Adequate warning regarding the hazards associated with these containers is provided by both the primary posting of Radioactive Material Area warning signs, which meet the requirements of 10 CFR 20.1902(e) and the guidance provided in Section 7 of Regulatory Guide 8.30, and the radiation safety training program.

Honeywell also provides Change Rooms to facilitate donning, removal, and storage of protective clothing. Entry into the Change Rooms from outside of the restricted area is controlled. Personnel exiting the Change Rooms pass the personnel monitoring station before they exit the facility.

USNRC has granted MTW an exemption from the posting requirements of 10 CFR 20.1902(a). Honeywell establishes postings for Radiation Areas as follows:

RA entrances are posted with signs that include the "Radiation Area" warning. For any process equipment that emits radiation such that an individual could receive a deep dose equivalent (DDE) exceeding 5 millirem in one hour at 30 centimeters from the source, Honeywell:

- Posts the process equipment (or adjacent structures) "Caution - Radiation Area," and
- Establishes yellow and magenta floor markings around the process equipment at a distance sufficient to enclose the area where an individual may receive a DDE exceeding 5 millirem in one hour.

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Honeywell MTW also provides postings for Airborne Radioactivity Areas as required by 10 CFR 20.1902(d). Airborne radioactivity area postings are augmented by flashing red lights that alert personnel to the hazard.

Honeywell MTW also posts High Radiation Areas in accordance with 10 CFR 20.1902(b) and provides access controls for these areas in accordance with 10 CFR 20.1601.

Inherent in the design of the restricted area is the continued protection of the health and safety of occupational workers, members of the public, and the environment.

### **Technical Justification**

MTW proposes to commit to the following six criteria and provides a technical justification describing how each criterion will be met.

- 1) **Maintain the posting of the MTW Restricted Area (RA) to prevent accessibility to the public.**

The established RA is clearly posted and resides within a fenced enclosure of the site which provides for restricted access. The RA is maintained in accordance with applicable NRC security requirements as per the MTW Security Order EA-02-025 dated March 25, 2002. Control of the RA is as defined in 10 CFR 20.1003 - Definitions.

Access to the RA is restricted to individuals that have completed site specific training requirements or individuals that are formally escorted. At no time can members of the public access the RA without being escorted or trained.

**2) Controls are Imposed as necessary to keep radiation exposures and releases as low as reasonably achievable.**

MTW maintains and implements an effective Radiation Protection Program to keep worker exposures As Low as Reasonably Achievable (ALARA). These radiation protection principles are necessary to implement NRC ALARA requirements in 10 CFR 20.1101 and include engineering and other exposure control practices such as action levels to protect workers described in approved standard operating procedures. These principles are an integral part of the overall Radiation Protection Program that is routinely inspected by the NRC. Routine control adjustments to minimize exposures include modifications to protective clothing, adding respiratory protective equipment or restricting access to portions of the RA as needed. Operations are conducted in accordance with approved procedures for routine work in the RA that provide flexibility for upgrading and downgrading controls in response to changing radiological conditions.

**3) Radiation protection personnel are trained and qualified in contamination control and are readily available.**

During normal operations MTW provides sufficient Health Physics Technician (HPT) staffing on each production shift to support and respond to radiological conditions in the RA to ensure appropriate and timely actions are taken. The HPTs are trained in contamination-control procedures and techniques required for responding to a contamination event and are readily available to respond as needed. The HPTs must successfully complete a rigorous training and qualification program prior to performing unsupervised activities. In addition, MTW employs a Health Physics Supervisor to provide guidance and technical radiation safety expertise to the HPTs.

**4) Equipment and facilities that may be needed for contamination control are readily available.**

The RA is designed to control contamination in process areas at the facility where unencapsulated uranium is routinely handled. These controls include engineered features such as ventilated areas designed to provide air flow to minimize potential contamination. Activities and process equipment that could potentially generate

airborne uranium are designed with ventilated containment enclosures, hoods, dust capturing exhaust ports, local exhaust systems and other devices to minimize the release of uranium in work areas. The air and gasses from the UF6 production processes are exhausted as appropriate through baghouses and scrubbers and then exhausted to the environment. Routine engineered and facility control adjustments to minimize exposures and the extent of a release include shutting down equipment, adding localized exhaust ventilation and closing or reducing containment hood openings.

**5) Radiation surveys of unplanned contamination events in the RA are performed and are available for NRC inspection upon request.**

Appropriate radiation surveys are performed by qualified personnel during or after an unplanned contamination event as necessary to assess radiological conditions and provide the appropriate response. The type of survey is determined by staff HPTs as described in the NRC approved license and in accordance with approved procedures. Survey results are compared to specified action guides and when contamination levels more than action levels are found, appropriate actions are taken, and the affected area is decontaminated in a safe and timely manner. Survey records for contamination events are documented pursuant to 10 CFR 20.2103 and are available for review.

**6) Unescorted workers in the RA are trained on methods to reduce radiation exposures including contamination controls and response actions for abnormal or upset conditions.**

Formal nuclear safety training is required for unescorted workers entering the RA. Visitors to the RA are escorted by trained personnel. The training includes information about radiation and radioactive materials, precautions or procedures to minimize exposure, the purposes and functions of protective devices employed; and their responsibility to report promptly to the licensee any condition which may lead to or cause a violation of NRC regulations and licenses or unnecessary exposure to radiation and/or radioactive material. The training also includes the appropriate response to warnings made in the event of any unusual occurrence or malfunction that may involve exposure to radiation and/or radioactive materials. Training policy requires that workers must complete nuclear safety training prior to unescorted access in the RA. The training is typically provided using computer-based training but may be performed by authorized instructors. The effectiveness of the training program is evaluated by an initial training exam. Training is maintained via monthly safety meetings designated as B-Council meetings. These meetings include special radioactive safety training each month.

## **10 CFR 40.14 Evaluation Criteria**

Pursuant to 10 CFR 40.14(a), the NRC may grant an exemption from the requirements of 10 CFR Part 40 if the staff determines that the exemption is authorized by law, will not endanger life or property or the common defense and security, and is otherwise in the public interest.

MTW has determined that granting the proposed exemption will not result in a violation of the Atomic Energy Act of 1954, as amended, other laws, or the Commission's regulations. Therefore, the requested exemption is authorized by law.

MTW has also determined that an exemption from the requirement to report within 24 hours a situation due to an unplanned contamination event inside the restricted area that requires worker access to the contaminated area to be restricted for more than 24 hours by imposing additional radiological controls or by prohibiting entry into the area will not endanger life or property or the common defense and security. In addition, MTW uses trained and qualified radiation protection personnel who have appropriate equipment readily available. And while the exemption request would eliminate the 24-hour reporting requirement for unplanned contamination events inside a RA, MTW will continue to report situations due to an unplanned contamination event outside an established RA, maintain records of these events and would provide this information to NRC for inspection upon request.

The elimination of the 24-hour reporting requirement also does not involve information or activities that could potentially impact the common defense and security of the United States. Rather, the requested exemption is administrative in nature and would reduce the number of licensee actions triggered by an event that imposes additional radiological controls or by prohibiting entry into an area. Based on its review of this information, MTW concludes that granting this exemption request would not endanger life or property or the common defense and security.

Finally, granting this exemption request is otherwise in the public interest because it promotes regulatory efficiency by relieving MTW from a reporting requirement that is of low safety significance given the site-specific conditions and programs described above. The exemption would relieve MTW from generating initial notification reports within 24 hours and written follow-up reports within 30 days of certain contamination events and the NRC staff from receiving and processing these reports, thereby allowing resources to be focused on other activities of higher significance or consequence.

### **Financial Considerations**

MTW takes its reporting responsibilities very seriously and commits a significant amount of time and resources to the evaluation and preparation of event reports to the NRC Operations Center if required. Specifically, the time spent preparing the initial event per 10

CFR 40.60(b)(1), the resource requirements for the site corrections action programs investigation and 30-day follow-up report required by 10 CFR 40.60(c) is substantial.

MTW thoroughly evaluates unplanned contamination events against the 10 CFR 40.60(b)(1) reporting criteria. MTW estimates the resource expenditure associated with timely evaluation and reporting (if necessary) of an unplanned contamination event including the time to develop the event report write-up to be 40 person-hours (Estimated Cost \$150.00 per person hour) or approximately \$6,000 per event report. The additional resources to perform an in-depth investigation, provide management review and briefings, identify corrective actions and issue the 30-day follow-up report are estimated at 240 person-hours or approximately \$36,000 per event report. The total expenditure per event that requires reporting per 10 CFR 40.60(b)(1) is estimated at 280 person-hours or \$42,000.

MTW estimates the frequency of contamination events within the Restricted Area that meet the NRC criteria of a potentially reportable unplanned contamination event to be 15 events per year. If not mitigated, the estimated cost of reporting these events would be \$630,000 a year.

Because of the extraordinary cost of reporting these low to no risk events, MTW applies numerous resources including operators, maintenance, area supervision, health physics personnel, regulatory affairs personnel, and senior staff to ensure the contaminated area within the Restricted Area is released within 24 hours. The event response, which begins immediately, includes an assessment of reportability, entry of the event in the corrective actions program, an investigation, development of corrective actions and management review. It is important to note this resource estimate only includes those hours above and beyond the cost associated with commensurate risk incidents which arise in the Restricted Area (e.g. responding to a smear or area air sample above the action level). That is why it is important to include it in the true costs. These costs would not be incurred, were it not for the potential regulatory 24-hour report. The resource estimate is 48 person-hours (It is estimated that there are 15 of these events on average per year) or \$7,200 per occurrence or \$108,000 per year.

**Conclusion:**

Based on the above, MTW has concluded that the activities to be authorized by the issuance of an exemption follows the law and will not endanger life or property or the common defense or security. MTW also concludes that granting the exemption is in the public interest.

Accordingly, MTW requests an exemption from the 24-hour reporting requirement in 10 CFR 40.60(b)(1) for situations due to an unplanned contamination event inside established contamination radiological controlled area that requires worker access to the contaminated area to be restricted for more than 24 hours by imposing additional radiological controls or by prohibiting entry into the area.

MTW proposes a new License Condition LC-XX be issued to reflect the exemption from reporting as follows:

LC-XX – Notwithstanding the requirements of 10 CFR 40.60(b)(1), the licensee is exempted from the requirement to report unplanned contamination events when the following conditions are met:

1. The event occurs in the restricted area in a building which is maintained inaccessible to the public by multiple access controls,
2. The area was controlled for contamination before the event occurred, the release of radioactive material is under control, and no contamination has spread outside the area,
3. Radiation safety personnel trained in contamination control are readily available,
4. Equipment and facilities that may be needed for contamination control are readily available, and
5. The otherwise reportable unplanned contamination event is documented in the licensee's Corrective Action Program.

The licensee commits to 1) Continuing to maintain the posting of the Restricted Area (RA) which is not accessible to the public, 2) Impose controls as necessary to keep radiation exposures and releases as low as reasonably achievable, 3) Ensure radiation protection personnel are trained and qualified in contamination control and are readily available, 4) Provide equipment and facilities that may be needed for contamination control, 5) Perform radiation surveys of unplanned contamination events in RAs and provide records for NRC inspection upon request, 6) Train unescorted workers in RAs on methods to reduce radiation exposures including contamination controls and response actions for abnormal or upset conditions.