

# Honeywell

THE POWER OF **CONNECTED**

## Performance Materials and Technologies

2768 North U.S. 45 Road

P.O. Box 430

Metropolis, IL 62960

www.honeywell.com

January 5, 2022

UPS/Next Day Air

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

Docket No. 40-3392  
License No. SUB-526

### **RE: Honeywell Metropolis Works Triennial Update to Decommissioning Funding Plan**

Pursuant to License Condition 18A – License Application and 10 CFR 40.36(d), Honeywell International Inc. (Honeywell) is providing an updated Decommissioning Funding Plan (DFP). The updated DFP includes the attached Decommissioning Cost Estimate for the required decommissioning activities at Honeywell's conversion facility in Metropolis, Illinois. The revised Decommissioning Cost Estimate updates the previous Decommissioning Cost Estimate, which was originally submitted to the NRC on January 6, 2019. A revised DCE that included Honeywell responses to the NRC's request for additional information was submitted on June 1, 2020. The revised version of the DCE was approved by the NRC on July 9, 2020. The current Decommissioning Cost Estimate reflects consideration of the items listed in 10 CFR § 40.36(d)(1)(i)-(ii). The current Decommissioning Cost Estimate also includes consideration of the effects of changes in residual radioactivity in onsite subsurface material, changes in waste inventory, changes in waste disposal costs, and facility modifications.

Honeywell's current NRC-approved decommissioning funding plan utilizes letters of credit as the mechanism to provide decommissioning financial assurance. Honeywell intends to rely on one or more letters of credit or surety bonds as the financial assurance mechanism for the updated cost estimate. Honeywell will submit revised financial instruments to reflect the updated Decommissioning Cost Estimate amount after resolution of any NRC comments and within 30 days of the NRC approval date.

In accordance with 10 CFR 40.36(d)(1)(v), Honeywell is not providing a copy of the letters of credit documentation because the previously submitted and accepted letters of credit remain in place.

In accordance with 10 CFR 40.36(d)(1)(iv), Honeywell has enclosed a certification that financial assurance for decommissioning has been provided in the amount of the currently approved decommissioning cost estimate.

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The Decommissioning Cost Estimate contains security-related sensitive information that should be withheld from public disclosure under 10 CFR 2.390, "Public inspections, exemptions, requests for withholding." Specifically, each page of the Figures and Drawings section contains security-related sensitive information. Accordingly, the Figures and Drawings section is being provided in a separate attachment that is marked for withholding from public disclosure.

Should you have any questions on the enclosed information, please contact Sean Patterson, Regulatory Affairs Manager, at 618-524-6341

Sincerely



Brian Hunt  
Plant Manager

Enclosures:

1. Certification of Financial Assurance (PUBLIC)
2. Decommissioning Cost Estimate (w/o Figures and Drawing section) (PUBLIC)
3. Figures and Drawing section (NON-PUBLIC)

Cc: Osiris Surano-Perez – Project Manager  
Fuel Facilities Licensing Branch  
Division of Fuel Management  
Office of Nuclear Material Safety and Safeguards

**ENCLOSURE 1**  
**CERTIFICATION OF FINANCIAL ASSURANCE**  
**(PUBLIC VERSION)**

# Honeywell

## HONEYWELL CORPORATE

300 S. Tryon St, Suite 500 / 600  
Charlotte, NC 28202  
www.honeywell.com

### CERTIFICATION OF FINANCIAL ASSURANCE

Principal: Honeywell International Inc.  
300 S Tryon St Suite 500  
Charlotte, NC 28202

Facility: NRC License SUB-526

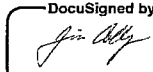
Honeywell International Inc.  
2768 North US 45 Rd.  
Metropolis, Illinois 62960

Issued to: U.S. Nuclear Regulatory Commission

I certify that Honeywell International Inc. is licensed to possess the following types of material in the following amounts:

Natural uranium	Yellow cake, U3O8, UO2, UO3, UF4, UF6 and chemical intermediates of these compounds	68 million kg (150 million lbs.)
Depleted Uranium	U3O8, UO2, UF4, and UF6	68 kg (150 lbs)
Cs-137	Sealed sources	300 mCi
Any licensed material between atomic numbers 3-83	Sealed and unsealed radioactive sources	2 mCi total
Any licensed material between atomic numbers 84-95	Sealed and unsealed radioactive sources	1 microcurie total

I also certify that financial assurance in the amount of \$206,175,636.00 has been obtained for the purpose of decommissioning as prescribed by 10 CFR Part 40.

DocuSigned by:  
  
650CE75DD00040E...

Name: Jim Colby

Title: Vice President and Treasurer

Date: 14-Dec-2021