

Performance Materials and Technologies

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April 26, 2023

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: Responses to the NRC Comments on the Honeywell Financial Instruments

In a letter dated March 9, 2023, the U.S. Nuclear Regulatory Commission (NRC) staff submitted a letter including comments on the Honeywell MTW financial instruments that were submitted to the NRC on February 13, 2023.

Honeywell MTW has reviewed the comments and the MTW responses to the comments are included as Enclosure 1 to this letter. Also, included as Enclosure 2 to this document, is the updated financial instruments.

The final financial documents contains security-related sensitive information that should be withheld from public disclosure under 10 CFR 2.390, "Public inspections, exemptions, requests for withholding."

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

Sincerely



Brian Hunt
Director Chemical Plant Operations

Enclosures:

1. Response to RAIs related to the Honeywell MTW financial instrument submittal
2. Updated financial instruments (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 – Responses to Request for Additional Information

~~OFFICIAL USE ONLY – PROPRIETARY INFORMATION~~

**Honeywell Metropolis Works
2022 Decommissioning Funding Plan Financial Instruments
U.S. Nuclear Regulatory Commission Staff Comments**

NRC Comment 1 – The letter of credit from UniCredit Bank AG includes two “authorized signatures,” but does not provide the printed names and titles of the signatories, which are necessary for the U.S. Nuclear Regulatory Commission (NRC) to be able to confirm that the signatories are authorized to execute the document. Please provide an updated amendment to this letter of credit, specifically including the printed name and title of the signatories.

MTW Response – The titles of the signators have been added to the UniCredit Bank AG Letter of Credit. The revised UniCredit Bank AG Letter of Credit is included in Enclosure 2.

NRC Comment 2 – Schedule A is not amended to include the updated decommissioning cost estimate and the date the cost estimate was last adjusted and approved by the NRC. To ensure the standby trust agreement is fully up to date and allows the trustee to access the full amount of coverage to conduct all decommissioning activities, the licensee must provide a revised, partially executed amendment to the existing standby trust agreement, specifically updating Schedule A.

MTW Response – Schedule A has been amended to include the date the last cost estimate as requested in this RAI. The amended Schedule A is included in Enclosure 2.

NRC Comment 3 – The Honeywell certification of financial assurance does not include a date in the signature block or elsewhere in the document. To provide the necessary information about the effective date of the certification of financial assurance, the licensee must include a date with the signature or, otherwise, specify the effective date.

MTW Response – To verify the signature and provide the date that the certification of financial assurance was made effective, MTW has provided a DocuSign document indicating that the signature is accurate with the date (February 7, 2023) being provided in the DocuSign Certification document attached as part of Enclosure 2

Enclosure 2 – Updated Financial Instruments

~~**Security Related Information**~~

Withhold und 10 CFR 2.390