The Honeywell Metropolis Works NRC License Discussion

#SUB-526, Docket No. 40-3392

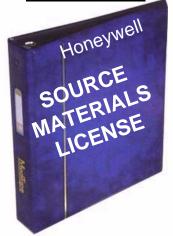
Meeting Date: 4/26/05

Current License Expiration Date: June 30, 2005

Honeywell

- 10 CFR 40, Domestic Licensing of Source Material
- Regulatory Guide 3.55, Standard Format and Content for the Health and Safety Sections of License Renewal Applications for Uranium Hexafluoride Production
- License references additional Regulatory Guides:
 - 8.9, Acceptable Concepts, Models, Equations, and Assumptions for a Bioassay Program
 - 8.10, Operating Philosophy for Maintaining Occupational Radiation Exposures As Low As Is Reasonably Achievable
 - 8.15, Acceptable Programs for Respiratory Protection
 - 8.30, Health Physics Surveys in Uranium Recovery Facilities
 - 8.37, ALARA Levels for Effluents from Materials Facilities
 - 10.1, Compilation of Reporting Requirements for Persons Subject to NRC Regulations

License



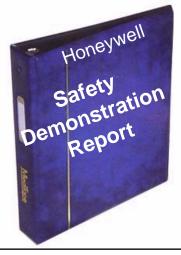
License Attachments

(Referenced in the License)

ERP/RCP

Security

Separate Reports

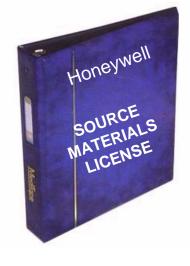


Safety Demonstration Details

Plant Process Maps/Drawings

Environmental Report

US NRC Material License



- US NRC Material License #SUB-526, Docket No. 40-3392
- Expiration Date: June 30, 2005.
- Performance Requirements

Performance Requirements: Honeywell Commitments

- Chapter 1: Standard Conditions/Special Authorizations
- Chapter 2: General Organizational and Administrative Requirements
- Chapter 3: Radiation Protection
- Chapter 4: Environmental Protection
- Chapter 5: Special Processes (EPF, Dust Collectors, Chemical Safety, Standby Utilities, Radioactive Waste Management)
- Chapter 6: Decommissioning Plan (references financial assurance mechanism)
- Chapter 7: Radiological Contingency Plan (refers to Radiological Contingency Plan)



Demonstrates License Adequacy

Safety Demonstration Report

- Chapter 1: Overview of UF6 Operation
- Chapter 2: Facility Description (Utilities, LN2, Refrigeration, Ventilation, Rad. Waste, Fire Protection, Chemical Systems)
- Chapter 3: Organization and Personnel (Org. Charts, Descriptions, Management Of Change, SOPs, Training)
- Chapter 4: Radiation Protection
- Chapter 5: Environmental Safety (Data, Fenceline TLDs, Air Sampling, Liquid Effluent, River & Mud, Soil Sampling)
- Chapter 6: Process Description/Safety Analyses
- Chapter 7: Accident Analyses

- In-Plant Accuracy Review/Sign-Off
 - **¤** Finalize Draft (5/2/05-5/6/05)
 - In-Plant Verification (5/9/05-5/13/05)
 - **¤** Final Revisions (5/16/05-5/20/05)
 - px Final License Submittal (5/27/05)
 - Implement New License Requirements within 90 days of NRC approval.

- Separate Environmental Report (With Submission)
- PSM Referenced to 29 CFR 1910.119
- DUF₆ Removal from License
- Security ICM's Incorporated by Reference
- EPF Modification Discussion- Clarify in new license
- Conduct of Operations- *
- Revising process for Radiological Posting- *
- Maintaining Container Labeling Exemption- *
- Summary of significant changes for comparison
- Electronic Submittal (Requirements)

*Discussed Separately

Develop and implement a Conduct of Operations Procedure that establishes clear written requirements for:

- Operator Attentiveness
- Shift Turnovers
- Pre-Shift and Pre-Job Briefings
- Procedural Adherence

- Reviewed requirements, guidance, current exemption, and current practices
- Radioactive Material Area Posting
 - Current practices consistent with 10 CFR 20 and RG 8.30 no exemption required
- Radioactive Material Labeling
 - Propose to maintain exemption for thousands of drums of natural uranium and associated byproduct materials, justification provided in safety demonstration report

Radiological Hazard Posting and Controls

Honeywell

Radiation Areas

- Current posting practices consistent with 10 CFR 20, but effectiveness can be improved
- Propose to eliminate exemption, move postings closer to affected areas
- For higher hazard areas (e.g., radiation levels exceed specified level but < high radiation area), propose additional warning devices or barriers
- Warning devices may include (as appropriate) flashing lights or audible alarms
- Barriers may include rope, chain, cable, or fencing accompanied by supplemental radiation area postings

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