

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

Primary Requirements and Guidance

- **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***

New License Format

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

Honeywell

- 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)**

Safety Demonstration



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**

Overview of License Renewal

- **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)**
 - ✘ **Final License Submittal (5/27/05)**
- **Implement New License Requirements within 90 days of NRC approval.**

Overview of License Renewal, Continued

- **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**

Radiological Hazard Posting and Controls

- **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**

Summary of License Renewal Efforts

- 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)
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