

Specialty Materials

Honeywell
P.O. Box 430
Highway 45 North
Metropolis, IL 62960
618 524-2111
618 524-6239 Fax

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UPS: 301-415-8147

US Nuclear Regulatory Commission
Director, Office of Nuclear Material Safety & Safeguards
Attention: Document Control Desk
Mail Stop T8A33, Two White Flint N, 11545 Rockville Pike
Rockville, MD 20852-2738

Docket No. 40-3392
License No. SUB-256

Dear Sir or Madam:

This letter is our response to the NRC Inspection Report 40-3392/2008-001 and Notice of Violation dated May 2, 2008.

During an NRC inspection conducted on March 24 – April 3, 2008, a violation of NRC requirements was identified. In accordance with the requirements of NUREG 1600, "General Statement of Policy and Procedure for NRC Enforcement Actions," the violation described in the inspection report is listed below:

License Condition 18 of NRC License No. SUB-526 requires that licensed activities at the Honeywell Metropolis Works Facility be conducted in accordance with the statements, representations and conditions (or as revised by change and/or configuration management processes described therein) in the Integrated Safety Analysis Report dated October 26, 2006.

License Condition 19 of NRC License No. SUB-526 also states that within 180 days of the issuance of the renewed license, all Plant Features and Procedures, to be designated PFAP, shall be developed and implemented within the ISA.

Section 9.4.1 of the ISA, states, in part, that management measures will ensure that PFAPs are designed, implemented, and maintained, as necessary, to be available and reliable to perform their intended safety function when needed as described in the following examples:

Contrary to the above, the licensee did not have adequate management measures to ensure that PFAP were implemented and maintained to be available and reliable to perform their intended safety function when needed as described in the following examples:

1. Management did not ensure that procedure MTW-EOP-GSO-0600, "Green Salt Emergency Shutdown," which has been designated PFAP 39 in Table 1 of MTW-ADM-OPS-0121, "Management of Plant Features and Procedures", was properly implemented and maintained to perform its safety function when needed.

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Specifically, operators did not know under what conditions to initiate procedure MTW-EOP-GSO-0600.

2. The preventative maintenance procedure for PFAP35 (automatic shutdown of ammonia feed) was not performed within the required time period (two years) to ensure that PFAP 35 was reliable to perform its intended safety function when needed. This violation was caused by a failure to properly establish maintenance cycles using the maintenance management computer software.
3. Management measures for PFAP 35 (automatic shutdown of ammonia feed) did not include an integrated functional test of PFAP 35 to ensure that it is reliable to perform its intended safety function when needed, as required by Procedure ADM-QA-0100-R0, section 4.2.4.2

This is a Severity Level IV violation (Supplement VI).

1) Reason for violation:

Example (1) Honeywell acknowledges that operator response to NRC questions regarding entry conditions for procedure MTW-EOP-GSO-0600 was not satisfactory. Follow up questioning by Honeywell supervision determined that although operators had adequate knowledge of the procedure, that information was not communicated clearly to the inspector.

Example (2) The database (SAP) entry for planned maintenance management for PMP 5467 for H2S scrubber was not entered correctly. The PM setup in SAP allowed the frequency to extend based on the PM close date versus the PM call date (ie the frequency was not fixed).

Example (3) PM activities for PFAP 35 included performance of PMs for individual component functional testing associated with PFAP 35, rather than integrated testing. The requirement stated from procedure ADM-QA-0100-R0 (see below), was not interpreted to imply an integrated test of the PFAP.

4.2.4.2 Performs planned surveillance testing (e.g., functional/performance testing, instrument calibrations) to monitor the integrity and capability of PFAP, and any items that may affect the function of PFAP, to ensure they are available and reliable to perform their function when needed.

2) Actions taken and results achieved:

Note: each of the examples below is being addressed within the Corrective Action Program.

Example 1) An assessment of Green Salt Operator knowledge regarding entry conditions for procedure MTW-EOP-GSO-0600 was performed. This assessment concluded that operator knowledge was sufficient in this area.

Example 2) PM 5467 was successfully completed after discovery, and was returned to frequency.

Example 3) PMs were developed to perform an integrated functional test of PFAP 35. Performance of these PMs for integrated testing of PFAP 35 were scheduled and completed during the recent plant annual shutdown period (March 31-April 12, 2008).

3) Corrective actions planned to avoid further violations:

Example 1) Operator briefings were conducted which included discussion of procedure MTW-EOP-GSO-0600 to improve communications regarding entry conditions for this procedure.

Example 2) Corrective action is being performed to address how parameters are set to establish frequency in the database (SAP) used to schedule PM performance.

Example 3) Extent of condition is being performed to determine the scope of additional PM development and implementation actions needed to address integrated functional testing for any PFAPs for which such testing is not currently in place.

4) Date when full compliance will be achieved:

It is anticipated that full compliance for Examples 1 and 2 will be achieved by July 18, 2008. Full compliance for Example 3 will be achieved by April 30, 2009.

If you have additional questions, please contact Mr. Larry Parscale, Regulatory Affairs Manager, at 618-524-6221.

Sincerely



Mitch Tillman
Plant Manager

cc: File – RMDC
L. Parscale

Regional Administrator
Region II, US Nuclear Regulatory Commission
Sam Nunn Atlanta Federal Center
23T85, 61 Forsyth Street, S.W.
Atlanta, GA, 30303-8931

(UPS: 404-562-4731)

US Nuclear Regulatory Commission
Attention: Mr. Michael Raddatz
Fuel Cycle Licensing Branch
Mail Stop T-8A33
Two White Flint North, 11545 Rockville Pike
Rockville, MD 20852-2738

(UPS: 301-415-6334)

US Nuclear Regulatory Commission
Attention: Ms. Tilda Liu
Fuel Cycle Licensing Branch
Mail Stop T-8A33
Two White Flint North, 11545 Rockville Pike
Rockville, MD 20852-2738

(UPS: 301-415-6334)

Region II, US Nuclear Regulatory Commission
Attn: Mr. Jay L. Henson
Sam Nunn Atlanta Federal Center
23T85, 61 Forsyth Street, S.W.
Atlanta, GA, 30303-8931

(UPS: 404-562-4731)