## UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

## BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of:	)	
HONEYWELL INTERNATIONAL INC.	)	Docket No. 40-3392
(Metropolis Works Conversion Facility)	)	

## **AFFIDAVIT OF JOHN TUS**

I, John Tus, do hereby state as follows:

- 1. I am the Vice President and Treasurer of Honeywell International. A statement of my professional qualifications was previously provided.
- During the evidentiary hearing held on December 15, 2011, the Licensing Board requested additional information regarding Honeywell's debt. I provided an initial response containing that information on January 4, 2012. On January 5, 2012, the Licensing Board requested further clarifying information. That information is provided in this affidavit.
- 3. As an initial matter, Honeywell's January 4, 2012 response to the Licensing Board included <u>all</u> of the debt liabilities of Honeywell International Inc. and its consolidated subsidiaries. The information was not limited to the indebtedness of the parent company.
- 4. As a result, in response to Question 1, none of the indebtedness of any Honeywell subsidiary encumbers or restricts in any manner the goodwill of that subsidiary.
- 5. Further, in response to Question 2, none of the indebtedness of any Honeywell subsidiary existing at the time of the request for exemption (and denials) encumbered or restricted the encumbrance of the goodwill of such subsidiary at that time (or subsequently).

- 6. For additional context, total subsidiary debt is only a small fraction of reported goodwill.

  At the end of fiscal years 2008, 2009, and 2010, total subsidiary debt was far less than 5% of the reported goodwill of Honeywell on a consolidated basis.
- 7. I hereby certify under penalty of perjury that the foregoing is true and complete to the best of my knowledge, information, and belief.

Executed in accord with 10 C.F.R. § 2.304(d),

signed electronically by John Tus
John Tus
Vice President and Treasurer
Honeywell International Inc.
101 Columbia Road
Morristown, NJ 07960
John.Tus@honeywell.com

Dated at Morristown, New Jersey this 12th day of January 2012