



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION II
245 PEACHTREE CENTER AVENUE NE, SUITE 1200
ATLANTA, GEORGIA 30303-1257

October 16, 2014

Mr. David Shier
President
Canadian Nuclear Workers' Council
244 Eglinton Ave. E
Toronto, ON M4P 1K2 Canada

Dear Mr. Shier:

I am responding to your letter of September 22, 2014, to Chairman Macfarlane, Nuclear Regulatory Commission (NRC), regarding the current operating status of the Honeywell Metropolis Works facility located in Metropolis, IL. I am responding to your letter because this office (NRC, Region II) has regulatory oversight responsibility for the Honeywell Metropolis Works facility (Honeywell).

As you noted in your letter, workers were locked out at Honeywell on August 1, 2014, when negotiations failed to result in a new contract, and replacement staff have been operating the facility since this time. Please be advised that prior to the start of contract negotiations NRC inspection staff, in accordance with applicable procedures, developed a strike contingency plan to govern the review and evaluation of Honeywell's contingency plans for operating the facility in the event a lockout or strike occurred. NRC staff performed inspections to, among other things, determine (and confirm) that: 1) the required minimum number of qualified personnel would be available to safely operate the facility; 2) required equipment would be available and operable; 3) personnel who would be performing licensed activities were qualified and properly trained; 4) operations and facility security would be maintained; and 5) regulatory requirements for operations, maintenance, chemistry and radiation protection, and administrative controls would be met.

NRC staff performed the above referenced contingency plan inspection in July 2014. In addition, inspectors were on-site at Honeywell in the days preceding the lockout to review the training and qualification of temporary workers. As the lockout began and facility operations transitioned from hourly staff to replacement workers, NRC inspection staff provided continuous, 24 hour, on-site coverage during the first 72 hours of the lockout, observing operations and other activities as they were being performed by replacement workers. Our inspectors confirmed that Honeywell's contingency plan was effectively implemented and licensed activities were being conducted safely and in accordance with regulatory requirements.

We have dispatched inspection staff to Honeywell at various times during the lockout to evaluate the licensee's performance as it relates to safe operation of the facility. Inspectors also evaluated temporary worker performance during these visits. In addition, we have held daily status calls with Honeywell to discuss plant operations and other issues related to health, safety, environmental protection, and security of licensed materials. To date, no significant issues or violations related to operations have been identified. During the course of the lockout, NRC inspection staff will continue to perform routine and supplemental safety inspections to verify that operations at the facility are being conducted safely and in accordance with requirements.

In your letter, you described a conversation you had with Commissioner Ostendorff regarding the status of the Honeywell facility during an August 2014 meeting in Vancouver, and your disagreement with his assertion that the NRC deemed the facility safe. You also discussed a letter dated September 11, 2014, from United Steel Workers' (USW) President, Leo Girard regarding a number of issues involving Honeywell. Finally, you suggested that a simple risk assessment would indicate that operating the facility with replacement workers creates the potential for a serious accident or incident affecting workers, the public and the environment.

With respect to the letter you reference from USW President Girard, we have no record of having received this correspondence and therefore, cannot respond to its contents. Regarding your suggestion to perform a risk assessment, the NRC routinely evaluates risk in discharging its oversight responsibilities. The primary contributors to risk, as it relates to replacement workers, are the training they receive, the standards for qualification to perform tasks, procedural guidance for completing tasks, and compliance with procedures when performing tasks. These elements were independently inspected and determined to be effectively implemented to ensure safe operation of the facility. We will continue to review these elements as well as other activities at Honeywell during the lockout as part of routine and supplemental inspections. When the lockout is resolved, we also will evaluate the retraining of returning workers in order to confirm that the licensee can continue to safely conduct plant operations.

Thank you for communicating with us. Should you have any additional questions or concerns, do not hesitate to contact us.

Sincerely,

/RA/

Victor M. McCree
Regional Administrator

cc: D. Emche, OIP
S. Wittick, OIP

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 Victor M. McCree
 Regional Administrator

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 ADAMS: Yes ACCESSION NUMBER: ML14293A182 SUNSI REVIEW COMPLETE FORM 665 ATTACHED

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