



International Federation of Chemical, Energy, Mine and General Workers' Unions
Internationale Föderation der Chemie-, Energie-, Bergbau- und Fabrikar-beitengewerkschaften
Fédération Internationale des Syndicats de Travailleurs de la Chimie, de l'Energie, des Mines et des Industries Diverses
Internationella kemi-, energi-, gruv- och fabriksarbetarefederationen
Federación Internacional de Sindicatos de Trabajadores de la Química, Energía, Minas e Industrias Diversas
国際化学エネルギー鉱山一般労連
Международная федерация профсоюзов химиков, энергетиков, горняков и работников других отраслей

President: Senzeni Zokwana • **General Secretary:** Manfred Warda

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July 18, 2011

Mr. Gregory B. Jaczko
Chairman
US Nuclear Regulatory Commission
Mail Stop 1-16G4
Washington, DC 20555-0001
USA

Sent to e-mails: NRCExecSec@nrc.gov and ocr_web@nrc.gov

Dear Mr Jaczko:

We write regarding a very serious concern of the International Federation of Chemical, Energy, Mine and General Workers' Unions (ICEM) and our Nuclear Workers' Sector, the International Nuclear Workers' Union Network (INWUN), regarding the US Nuclear Regulatory Commission (NRC) granting operating licenses last year to Honeywell Inc. at a uranium conversion plant in Metropolis, Illinois. The ICEM is a 20-million-member Global Union Federation based in Geneva, Switzerland, and we count as one of our 467 trade union affiliates the United Steelworkers of America (USW).

On June 28, 2010, 228 members of USW Local 7-669 in Metropolis were locked out by Honeywell at this facility, a plant that converts yellow-cake uranium to uranium hexafluoride (UF₆) for nuclear power applications. At first, Honeywell told the union that it would not operate the plant during the lockout but changed course weeks into the shutdown and began using replacement workers to re-start production. On September 3, 2010, the NRC gave approval to Honeywell to re-start the third and fourth steps of the conversion process.

On July 14, 2011, ICEM INWUN delegates from across the world met in Boston, Massachusetts, and in addition to our regular business, we examined the irrationality of this decision, as well as the number of safety, environmental, and near-miss occurrences at the Metropolis facility since the plant was re-started. At our meeting, members of USW Local 7-669 were present, as active participants in INWUN, and their presentations confirmed to us the dangers of operating such a dangerous facility with under-trained and inexperienced replacement workers.

We were told the NRC has cited Honeywell with license violations since the re-start and we also know that the US Occupational Health and Safety Administration (OHSA) recently cited the company with 17 serious violations for improper protocol in events that led to an explosion last December when accumulated hydrogen reacted with fluorine gas during a venting process. Fortunately, no one was injured. We also know that the Environmental Protection Agency (EPA) also has issued citations.

Trade union delegates employed inside nuclear power stations and across the nuclear supply chains worldwide, attending the INWUN meeting, were appalled that the NRC has allowed Honeywell to operate the facility. Without a doubt, they believe that such operation places potential threats and irreparable harm to the community of Metropolis in southern Illinois. Further, any accident whatsoever will be a major liability to the US nuclear industry. This is totally unacceptable at a time when the world is still reeling from the Fukushima Daiichi nuclear power plant situation in Japan.

It is the consensus from our Boston conference that the NRC was remiss in allowing Honeywell to operate this plant. It is also our view that unionized nuclear workers with safety as a first priority, something that temporary replacement workers are not focused on. This understanding is supported by nuclear regulators worldwide.

The ICEM, and the delegates attending the INWUN conference, demands that the NRC exercise its authority to shut down the Metropolis plant until the lockout is over and it can be safely operated by experienced workers, members of USW Local 7-669. Thank you for your kind attention.

Sincerely,



Manfred Warda
ICEM General Secretary



David Shier
INWUN Chairman