

November 8, 2005

MEMORANDUM TO: Gary S. Janosko, Chief  
Fuel Cycle Facilities Branch  
Division of Fuel Cycle Safety  
and Safeguards  
Office of Nuclear Material Safety  
and Safeguards

THRU: John Lubinski, Chief  
Fuel Manufacturing Section  
Division of Fuel Cycle Safety and Safeguards \RA\  
Office of Nuclear Material Safety  
and Safeguards

FROM: Mary Adams, Project Manager  
Fuel Cycle Facilities Branch \RA\  
Division of Fuel Cycle Safety  
and Safeguards  
Office of Nuclear Material Safety  
and Safeguards

SUBJECT: WESTINGHOUSE ELECTRIC COMPANY COLUMBIA FUEL  
FABRICATION FACILITY LICENSE RENEWAL MEETING,  
SEPTEMBER 12, 2005

On Monday September 12, 2005, Fuel Cycle Safety and Safeguards (FCSS) staff met with Westinghouse Electric Company (WEC) representative Nancy Parr from the Columbia Fuel Fabrication Facility (CFFF) in Columbia, South Carolina. The meeting covered WEC's planned responses to a list of 20 Nuclear Regulatory Commission (NRC) comments communicated in a telecom on June 9, 2005, and documented in a telecon summary dated July 22, 2005 (ML052080098). WEC provided a discussion addressing each comment. WEC's presentation slides are included in the attachment to this meeting summary. In accordance with 10 CFR 70.38(a)(1), WEC communicated that its primary goal was to obtain a timely renewal status by submitting an acceptable license renewal application 30 days prior to license expiration on November 30, 2005.

The NRC participants were Mary Adams, Nick Baker, Mike Lamastra, Melanie Galloway, Breeda Reilly, Bob Lukes, Craig Hrabal and Matt Bartlett. Observers were Ken Ashe of Duke, Cogema, Stone and Webster and Dan Horner of McGraw-Hill.

Ms. Parr began by reiterating WEC's commitment to resolve the NRC concerns. She stated timely renewal is important for customers of CFFF, the citizens of Columbia, SC, and corporate management in light of ownership changes. WEC has attempted to apply a new licensing approach which is performance-based.

The NRC staff emphasized the December 2004 renewal application lacked enforceable commitments. The NRC told Ms. Parr that it appears that WEC has taken the bulk of commitments out of the license and placed them in descriptive documents. Ms. Parr said WEC considered the descriptive material as interwoven within the license.

The NRC staff also asked WEC to improve clarity by removing the large number of cross references within the application.

#### Slide 1:

Ms. Adams restated the need for WEC to clearly include institutional information in the license commitments as required in 10 CFR 70.22(a). Ms. Parr was concerned that placing specific names in the license would require WEC to apply for a license amendment if a new individual was appointed to the position. Mr. Lamastra and Ms. Adams emphasized that foreign ownership, president, and vice president names are required by the regulations.

#### Slides 2 - 9

Ms. Adams indicated that placing the descriptive documentation into commitment space would alleviate much of her concern for comments 2-9. Ms. Parr believed that such a solution would force WEC to file numerous licensing amendments in the future. WEC's goal in separating the descriptive and commitments sections was to allow WEC to change operational details without license amendments. Mr. Lamastra emphasized that 10 CFR 70.72(c) allows for operational changes subject to 10 CFR 70.72 and any specific license commitments.

#### Slide 5

Ms. Parr explained that under the current license, CFFF employees use the "Redbook" process to report unusual occurrences. WEC has invested heavily in a new computerized matrix system which will replace the "Redbook" reporting process. The NRC staff agreed that the computerized system was a positive development and encouraged its implementation. The NRC staff told Ms. Parr the application still required a "clearly defined line of communication and authority among the organizational units involved in engineering" (Comment 5). Ms. Parr agreed to add the lines of communication.

#### Slide 10

Ms. Parr noted that the changes to section 5.2 of the license application have been changed to match the current license. Mr. Lamastra indicated WEC has addressed a significant portion of his initial concern.

#### Slide 11

Mr. Hrabal was satisfied with WEC's commitment to include ANSI/ANS-8.3-1997. Ms. Galloway stated that the NRC is updating Regulatory Guide 3.71. WEC and NRC reviewers will need to take the modified regulatory guide into account.

Slide 12

Mr. Hrabal said he needs further review of WEC's response to comment 12. Mr. Hrabal desired WEC to give specifics on how it plans to restrict the movement of special nuclear material during criticality accident alarm system outage periods.

Slides 13-19

Mr. Hrabal indicated that placing the descriptive documentation into commitment space would alleviate much of his concern for comments 13-19. Ms. Galloway emphasized that WEC's key approach should be to put specific commitments into the license. Ms. Parr agreed to improve the commitment section. Mr. Hrabal and Ms. Adams agreed to conduct a conference call with WEC on Thursday September 15, at 1pm to further discuss Nuclear Criticality Safety (Comment 18).

Slide 20

Mr. Baker reiterated that WEC needs to commit to a specific set of standards such as those found in the National Fire Protection Association standards. Mr. Baker indicated that if WEC combined the descriptive material and commitments and included a commitment to a national standard such as NFPA, the license application would be at least minimally acceptable.

The meeting concluded with a discussion of how the NRC conducts reviews by using the guidance in the Standard Review Plan (NUREG-1520) (the SRP). Where it is not clear how a licensee meets regulatory requirements by means different from those defined in the SRP, the staff will identify requests for additional information in those areas. The NRC staff suggested that any alternate approach should be clear, to facilitate staff acceptance of the application and renewal in general.

Docket No.: 70-1151

License No.: SNM-1107

Enclosure: WEC presentation slides

## Slide 12

Mr. Hrabal said he needs further review of WEC's response to comment 12. Mr. Hrabal desired WEC to give specifics on how it plans to restrict the movement of special nuclear material during criticality accident alarm system outage periods.

## Slides 13-19

Mr. Hrabal indicated that placing the descriptive documentation into commitment space would alleviate much of his concern for comments 13-19. Ms. Galloway emphasized that WEC's key approach should be to put specific commitments into the license. Ms. Parr agreed to improve the commitment section. Mr. Hrabal and Ms. Adams agreed to conduct a conference call with WEC on Thursday September 15, at 1pm to further discuss Nuclear Criticality Safety (Comment 18).

## Slide 20

Mr. Baker reiterated that WEC needs to commit to a specific set of standards such as those found in the National Fire Protection Association standards. Mr. Baker indicated that if WEC combined the descriptive material and commitments and included a commitment to a national standard such as NFPA, the license application would be at least minimally acceptable.

The meeting concluded with a discussion of how the NRC conducts reviews by using the guidance in the Standard Review Plan (NUREG-1520) (the SRP). Where it is not clear how a licensee meets regulatory requirements by means different from those defined in the SRP, the staff will identify requests for additional information in those areas. The NRC staff suggested that any alternate approach should be clear, to facilitate staff acceptance of the application and renewal in general.

Docket No.: 70-1151

License No.: SNM-1107

Enclosure: WEC presentation slides

DISTRIBUTION:

FCFB r/f

Meeting Attendees

D.Stout

**ML052720572**

OFC	FCFB		FCFB		FCFB	
<b>NAME</b>	M.Adams		V.Cheney		J.Lubinski	
<b>DATE</b>	10/21/05		10/26/05		11/08/05	

**OFFICIAL RECORD COPY**