



Westinghouse Electric Company  
Nuclear Fuel  
Columbia Fuel Site  
P.O. Drawer R  
Columbia, South Carolina 29250  
USA

U. S. Nuclear Regulatory Commission  
~~Attn: Ms. Melanie A. Galloway, Chief~~  
Technical Support Group  
Division of Fuel Cycle Safety and Safeguards  
Washington, DC 20555

Direct tel: 803-647-3338  
Direct fax: 803-695-3964  
e-mail: parrnb@westinghouse.com  
Your ref:  
Our ref: LTR-RAC-06-19

February 24, 2006

SUBJECT: WESTINGHOUSE RESPONSE TO FUEL CYCLE FACILITY PERFORMANCE  
INDICATOR PROGRAM

Dear Ms. Galloway:

Your correspondence of February 3, 2006 requested stakeholder input to a program under consideration by the NRC staff related to Performance Indicators (PI). Westinghouse appreciates the opportunity to provide this feedback, and we are committed to working closely with the NRC and our industry partners, through NEI, to explore these and other possible revisions to the overall NRC oversight process.

The Westinghouse Columbia Fuel Fabrication Facility (CFFF) responses to your specific questions follow:

1. *What unique aspects of your facility do you believe should be taken into consideration as we propose facility-specific PI's?*

We believe that the diversity of processes at the different facilities makes the development of objective, meaningful PI's for each facility a challenge. Items such as the nature of the Ammonium Diuranate (ADU) wet, chemical process; the different types of equipment and technology used; and the age and size of the facility are unique aspects of the CFFF operations.

2. *What suggestions do you have for potential PI's and/or PI thresholds that might be applied specifically to your facility?*

The CFFF has had a safe operating history for over 37 years. The current metrics used by the CFFF for self assessment are listed in Section 3.6.2 of our existing License Application. Performance is summarized and trended every 6 months. At this time, without understanding what our industry partners are proposing, we do not have any suggestions for equitable thresholds that might be applied specifically to our facility.

If you have any questions, please contact me directly at (803) 647-3338.

Sincerely,



Nancy Blair Parr, Licensing Manager  
Westinghouse Columbia Fuel Fabrication Facility

Docket 70-1151 License SNM-1107

cc: U. S. Nuclear Regulatory Commission  
Attn. Ms. Mary T. Adams, Senior Project Manager  
Fuel Cycle Facilities Branch  
Division of Fuel Cycle Safety and Safeguards  
Washington, DC 20555

U. S. Nuclear Regulatory Commission  
Attn. Mr. Yawar Faraz  
Technical Support Group  
Division of Fuel Cycle Safety and Safeguards  
Washington, DC 20555

U. S. Nuclear Regulatory Commission, Region II  
Attn. Mr. Manuel Crespo  
Sam Nunn, Atlanta Federal Center  
61 Forsyth Street, SW., Suite 23T85  
Atlanta, GA 30303