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R2-B28

Westinghouse
Electric Corporation

Commercial Nuclear
Fuel Division

Drawer R
Columbia South Carolina 29250
(803) 776 2610

April 16, 1993

U.S. Nuclear Regulatory Commission
Attn: Mr. Dan Jones
101 Marietta Street NW, Suite 2900
Atlanta, Georgia 30323

Dear Mr. Jones:

RE: SNM 1107

Enclosed you will find a copy of our response to the South Carolina Department of Health and Environmental Control regarding an NPDES Notice of Violation relating to a Laboratory Certification Inspection conducted on March 23, 1993.

The non-compliance situation originated from a failure to be certified for the Dissolved Oxygen analytical parameter. We have initiated efforts to become fully certified for this parameter.

Should you have any questions regarding this issue, please contact me at (803) 776-2610, Extension 3671.

Sincerely,
WESTINGHOUSE ELECTRIC CORPORATION

Roger E. Fischer

Roger E. Fischer
Senior Engineer



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The Westinghouse Commercial Nuclear Fuel Division — Winner of the 1988 Malcolm Baldrige National Quality Award.

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Drawer R
Columbia South Carolina 29250
(803) 776 2610

April 14, 1993

Mr. J. Robin Foy, *SC-DHEC*
Environmental Quality Manager
Water Quality Assessment and
Enforcement Division
2600 Bull Street
Columbia, South Carolina 29201

Dear Mr. Foy:

RE: NPDES Permit #SC0001848
Correspondence 4/9/93

Westinghouse Electric Corporation Commercial Nuclear Fuel Division submits the following in response to your letter dated April 7, 1993.

(a) Reasons for Non-compliance

As an industrial wastewater analytical laboratory, we respond only to our own SC-DHEC required parameter analyses to maintain our NPDES permit compliance. Certain analyses are sent out to a qualified vendor lab. We incorrectly perceived from the March 1990 SC-DHEC Laboratory Certification inspection that we were approved for the dissolved oxygen parameter analysis. We began measurement of the dissolved oxygen parameter using a procedure derived from the EPA procedures manual under the direction of a graduate chemist and our laboratory director. At no time was there any intent to analyze unapproved parameters. The failure to gain SC-DHEC laboratory certification approval was inadvertent due to lack of familiarity with the regulation.

(b) Corrective Measures

We are immediately preparing an application for certification with the SC-DHEC Laboratory Certification Section. The dissolved oxygen procedure was reviewed during the recent lab inspection and found to be acceptable with minor corrections. We regret this misunderstanding and now fully understand the regulations regarding our limited certification.

Should you have any further concerns regarding this issue please contact Mr. Wilbur Goodwin, Manager of Regulatory Affairs at (803) 776-2610, Extension 3282.

E. J. Kellm for J. A. Fici

Mr. James A. Fici, Manager
Columbia Plant



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