



Page 1 of 2
Westinghouse Electric Company
Nuclear Fuel
Columbia Fuel Site
P.O. Drawer R
Columbia, South Carolina 29250
USA

U. S. Nuclear Regulatory Commission
Director, Office of Nuclear Material Safety and Safeguards
ATTN: Document Control Desk
Washington, DC 20555-0001

Direct tel: 803-647-3137
Direct fax: 803-647-2025
e-mail:
Your ref:
Our ref: LTR-RAC-07-74
September 27, 2007

SUBJECT: REPLY TO A NOTICE OF VIOLATION
REFERENCE: REPORT NO: 70-1151/2007-202

Pursuant to the provisions of 10 CFR 2.201, Westinghouse Electric Company herein provides formal response to your letter of August 29, 2007, regarding your inspection of the Columbia Fuel Fabrication Facility during the period of July 30-August 3, 2007.

Appendix A provides our response to the violation of NRC requirements specified in the Notice of Violation.

I hereby affirm that the statements made in this response are true and correct to the best of my knowledge and belief. Should you have any questions or require additional information, please contact Mr. Ralph Winiarski of my staff at 803-647-3173.

Sincerely,

WESTINGHOUSE ELECTRIC COMPANY

A handwritten signature in black ink, appearing to read 'Cary D. Alstadt', with a horizontal line extending to the right.

Cary D. Alstadt, Manager
Columbia Fuel Fabrication Facility

Attachments: Appendix A

cc: U. S. Nuclear Regulatory Commission
Regional Administrator, Region II
Atlanta Federal Center
61 Forsyth Street, SW, Suite 23T85
Atlanta, Georgia 30303-3415

U. S. Nuclear Regulatory Commission
Melanie A. Galloway, Chief
Technical Support Branch
Division of Fuel Cycle Safety and Safeguards, NMSS
Washington, DC 20555

TEO7
#1

APPENDIX A

WESTINGHOUSE RESPONSE TO NOTICE OF VIOLATION

A.1 The following information is provided in response to the violation described in your August 29, 2007 letter.

A.1.a ACKNOWLEDGEMENT OF THE VIOLATION

The violation is correct as stated in the Notice of Violation.

A.1.b REASON FOR THE VIOLATION

The reason for the violation is human error. Three flexible pipe sections were improperly stored on drums containing fissile material in the Integrated Fuel Burnable Absorber (IFBA) pellet archive room contrary to posted requirements that restricted moderating materials from being stored in the area.

A.1.c CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

Upon discovery, the moderating material was removed, and Redbook #10646 was entered to document the issue and the immediate corrective actions taken. In addition, maintenance management reviewed the issue with their personnel to reinforce procedure adherence with the NCS posting requirements and the use of human performance error prevention tools.

A.1.d ACTIONS TO PREVENT RECURRENCE

WEC implemented a new Criticality Safety Evaluation (CSE) for the area, CSE-16-G on September 27, 2007. This CSE analyzed moderating material in close proximity to the storage array, and the analysis eliminated the need for the administrative control that was violated.

A.1.e DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on August 1, 2007, when the flexible pipe sections were removed from the storage area.

fedex.com 1800.GoFedEx 1800.463.3339

fedex **US Airbill**
Express

FedEx Tracking Number

8630 9158 1616

0215

Recipient's Copy

1 From This portion can be removed for Recipient's records.

Date 4/26/2007

FedEx Tracking Number

863091581616

Sender's Name

Tracy Fisher

Phone

803 647-3298

Company

WESTINGHOUSE ELECTRIC CO NF

Address

5801 BLUFF RD

City

HOPKINS

State

SC

ZIP

29061-9121

2 Your Internal Billing Reference

3 To

Recipient's Name

US Nuclear Regulatory Commission

Company

ATIN Document Control Desk

Recipient's Address

Director Office of Nuclear Safety and Security

Address

11545 Rockville Pike Mailstop 2B62-40

City

Washington

State

DC

ZIP

20555-0001

0367590558



8630 9158 1616

4a Express Package Service

☒ FedEx Priority Overnight
Next business morning. Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.

☐ FedEx Standard Overnight
Next business afternoon. Saturday Delivery NOT available.

Packages up to 150 lbs.

☐ FedEx First Overnight
Earliest next business morning delivery to select locations. Saturday Delivery NOT available.

☐ FedEx 2Day
Second business day. Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.

☐ FedEx Express Saver
Third business day. Saturday Delivery NOT available.

* To most locations.

4b Express Freight Service

☐ FedEx 1Day Freight*
Next business day. Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.

☐ FedEx 2Day Freight
Second business day. Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.

Packages over 150 lbs.

☐ FedEx 3Day Freight
Third business day. Saturday Delivery NOT available.

** To most locations.

5 Packaging

☒ FedEx Envelope*

☐ FedEx Pak*
Includes FedEx Small Pak, FedEx Large Pak, and FedEx Sturdy Pak.

☐ FedEx Box

☐ FedEx Tube

☐ Other

* Declared value limit \$500.

6 Special Handling

☒ SATURDAY Delivery
Not available for FedEx Standard Overnight, FedEx First Overnight, FedEx Express Saver, or FedEx 3Day Freight.

☐ HOLD Weekday at FedEx Location
Not available for FedEx First Overnight.

☐ HOLD Saturday at FedEx Location
Available ONLY for FedEx Priority Overnight and FedEx 2Day to select locations.

Does this shipment contain dangerous goods?
One box must be checked.

☐ No ☐ Yes
As per attached Shipper's Declaration.

☐ Yes
Shipper's Declaration not required.

☐ Dry Ice
Dry Ice, B, UN 1845 x kg

☐ Cargo Aircraft Only

Dangerous goods (including dry ice) cannot be shipped in FedEx packaging.

7 Payment Bill to:

Enter FedEx Acct. No. or Credit Card No. below.

Obtain Recip. Acct. No.

☒ Sender
Acct. No. in Section 1 will be billed.

☐ Recipient

☐ Third Party

☐ Credit Card

☐ Cash/Check



Total Packages

Total Weight

Credit Card Auth.

*Our liability is limited to \$100 unless you declare a higher value. See the current FedEx Service Guide for details.

8 Residential Delivery Signature Options

If you require a signature, check Direct or Indirect.

☐ No Signature Required
Package may be left without obtaining a signature for delivery.

☐ Direct Signature
Someone at recipient's address may sign for delivery. Fee applies.

☐ Indirect Signature
If no one is available at recipient's address, someone at a neighboring address may sign for delivery. Fee applies.

519

Rev. Date 10/06/Part #158279-0194-2006 FedEx-PRINTED IN U.S.A.-SRS

The World On Time®

FedEx

TRK#

0215 8630 9158 1616

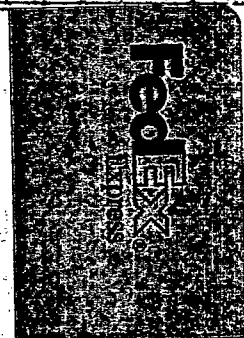
MON - 01 OCT A1
PRIORITY OVERNIGHT

XC-OBTA

IAD
DC-US
20555



FedEx Saturday Delivery



SD

1130 / 08
835
9/29