



Page 1 of 7
Westinghouse Electric Company LLC
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USA

U. S. Nuclear Regulatory Commission
Director, Office of Nuclear Material Safety and Safeguards
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Your ref:
Our ref: LTR-RAC-07-78
October 18, 2007

SUBJECT: REPLY TO A NOTICE OF VIOLATION
REFERENCE: REPORT NO: 70-1151/2007-002

Pursuant to the provisions of 10 CFR 2.201, Westinghouse Electric Company LLC herein provides formal response to your letter of September 19, 2007, regarding your inspection of the Columbia Fuel Fabrication Facility conducted during the periods of March 26-30, April 2-4 and April 16-18, 2007.

Appendix A provides our response to the violations 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 telephone Mr. Marc A. Rosser of my staff at (803) 647-3174.

Sincerely,

WESTINGHOUSE ELECTRIC COMPANY LLC

A handwritten signature in black ink, appearing to read 'Cary D. Alstadt', written over the printed name.

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

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APPENDIX A

A.1 The following information is provided in response to Violation (VIO) 70-1151/2007-02-01 for failure to wear adequate PPE while working in a potential HF environment.

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 was that the designated protective clothing for this work environment was less than adequate. The wrist length chemical resistant gloves did not protect the worker's upper arms and therefore the worker's arm was exposed to a potential HF environment within the ventilation enclosure tent.

A.1.c CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

Interim action was immediately taken to implement the use of shoulder length chemically resistant gloves and to train operators on the proper use of these gloves. This was completed for all shifts on February 28, 2007.

A.1.d ACTIONS TO PREVENT RECURRENCE

Westinghouse management performed an assessment of the use of Personal Protective Equipment (PPE) in the Chemical Area to determine the adequacy of protection. This evaluation included the activities associated with UF₆ cylinder pigtail replacement and was tracked to completion in the Corrective Action Process (CAPs) under Commitment # 07-057-C001.08.

Certification training was updated for operations personnel who may come in contact with HF to include hazards and protocols for treatment. This was tracked to completion in the CAPs under Commitment # 07-057-C001.05. Additional HF training information was also included in Conversion and URRS orientation training and was tracked to completion under Commitment # 07-057-C001.06.

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

Compliance was achieved on February 28, 2007 when Westinghouse management instituted use of shoulder length chemically resistant gloves.

A.2 The following information is provided in response to Violation (VIO) 70-1151/2007-02-02 for failure to provide or fax a Material Safety Data Sheet (MSDS) in a timely fashion to the responders and the hospital for an HF burned employee.

A.2.a ACKNOWLEDGEMENT OF THE VIOLATION

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

A.2.b REASON FOR THE VIOLATION

The reason for the violation was that the procedure was incomplete. The governing upper tier document, the Site Emergency Plan, specifically requires "Any personnel transported that has been contaminated and decontaminated shall have MSDS information provided to the responders or faxed to the hospital prior to arrival." However, the implementing procedure did not contain this specific instruction.

A.2.c CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

Westinghouse revised Site Emergency Procedure SEP-001, Administrative Procedure SYP-110, and developed a new detailed "Emergency Checklist for Medical Treatment and Transport" to address unique actions required for medical transport, including ensuring MSDS information is provided to all necessary parties. This was tracked in CAPs under Commitments numbers 07-057-C001.02 and 07-057-C001.17. These actions were completed on September 6, 2007 when the revised procedures were issued for use within the facility.

A.2.d ACTIONS TO PREVENT RECURRENCE

No further actions are necessary to prevent recurrence.

A.2.e DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on September 6, 2007 when revised procedures were issued for use in the Electronic Training and Procedure System (ETAPS).

A.3 The following information is provided in response to Violation (VIO) 70-1151/2007-02-03 for failure to train the nurse on the Hazard Communication Plan.

A.3.a ACKNOWLEDGEMENT OF THE VIOLATION

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

A.3.b REASON FOR THE VIOLATION

The reason for the violation was that the training program design was less than adequate.

A.3.c CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

Westinghouse revised Administrative Procedure SYP-110, Hazard Communication (Right-To-Know) to add read and acknowledge requirements for additional personnel, including the plant nursing staff. This was tracked in CAPs under Commitment numbers 07-057-C001.02 and 07-057-C001.17. These commitments were completed on September 6, 2007 when the revised procedure was issued for use within the facility. The facility nursing staff completed training to this procedure on October 2, 2007.

A.3.d ACTIONS TO PREVENT RECURRENCE

No further actions are necessary to prevent recurrence.

A.3.e DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on October 2, 2007 when the nursing staff completed the training requirement.

A.4 The following information is provided in response to Violation (VIO) 70-1151/2007-02-05 for failure to provide the required twelve-month training in 2006, to brigade members and the security guards.

A.4.a ACKNOWLEDGEMENT OF THE VIOLATION

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

A.4.b REASON FOR THE VIOLATION

The reason for the violation was that execution of the training program was less than adequate.

A.4.c CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

A training assessment has been completed identifying applicable NFPA requirements for a qualified fire brigade. A gap analysis of training needs has identified the necessary training needed by brigade members, those members who are currently qualified and those needing training, in part due to the loss of records for classes conducted. Classes are being scheduled to return these brigade members back to the fully documented qualified status. In addition, the documentation of Security Force annual training on the security aspects of the Site Emergency Plan is being formalized. The security force documentation issue and the training for the remainder of fire brigade members are commitments being tracked in CAPs under Issue # 07-269-C017.

A.4.d ACTIONS TO PREVENT RECURRENCE

Westinghouse has instituted a new full time EH&S Manager position, responsible for the activities of the Emergency Response organization. In addition, an assistant brigade chief has been assigned responsibility for Site Emergency Plan training, including scheduling, tracking and record keeping of emergency response related training.

A.4.e DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

All classes to restore brigade members and security staff to fully documented qualified status will be completed by December 31, 2007. Any members not completing the requirements will be removed from brigade duty at that time.

A.5 The following information is provided in response to Violation (VIO) 70-1151/2007-02-06 for failure to maintain current letters of agreement with the off-site support groups, revised annually, and renewed every four years.

A.5.a ACKNOWLEDGEMENT OF THE VIOLATION

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

A.5.b REASON FOR THE VIOLATION

The reason for the violation was that the Standards, Policies or Administrative Practices were less than adequate in that responsibility for the activity was not clearly defined.

A.5.c CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

All but one outside support organization has renewed the letters of agreement with Westinghouse. Discussions with South Carolina Department of Health and Environmental Control (SC-DHEC) for completion of the agreement have been in progress since April 2007. This is being tracked in CAPs under Issue # 06-229-C001.

A.5.d ACTIONS TO PREVENT RECURRENCE

Westinghouse has instituted a new full time EH&S Manager position, responsible for the activities of the Emergency Response organization. An internal tracking system has been established to ensure annual reviews and renewals are completed as required.

A.5.e DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance is expected to be achieved by December 31, 2007.

A.6 The following information is provided in response to Violation (VIO) 70-1151/2007-02-07 for failure to perform quarterly checks on emergency equipment, monthly checks on the brigade fire truck, the hazmat vehicles, and the equipment locker, and failure to keep the SCBAs within the required air pressure range.

A.6.a ACKNOWLEDGEMENT OF THE VIOLATION

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

A.6.b REASON FOR THE VIOLATION

The reason for the violation was that execution of the procedures was less than adequate.

A.6.c CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

Interim measures have been taken where fire brigade personnel have performed quarterly checks on emergency equipment, monthly checks on the brigade fire truck, the hazmat vehicles, the equipment locker, and the SCBAs. Emergency Procedures and Forms will be revised to address the required checks. This is being tracked in CAPs under Issue # 07-269-C017.

A.6.d ACTIONS TO PREVENT RECURRENCE

Westinghouse has instituted a new full time EH&S Manager position, responsible for the activities of the Emergency Response organization. In addition, an assistant brigade chief has been designated for planning and administrative activities.

A.6.e DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance is expected to be achieved by December 31, 2007.