



Page 1 of 13  
Westinghouse Electric Company LLC  
Nuclear Fuel  
Columbia Fuel Site  
P.O. Drawer R  
Columbia, South Carolina 29250  
USA

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

Direct tel: 803-647-2045  
Direct fax: 803-695-3964  
e-mail: couturgf@westinghouse.com  
Your ref:  
Our ref: LTR-RAC-10-54  
August 26, 2010

**SUBJECT: WESTINGHOUSE REPORTED EVENT 30 DAY FOLLOW UP REPORT**

The following information is being provided by Westinghouse Electric Company LLC (Westinghouse) in accordance with 10CFR70.50(c)(2). A summary of the initial notification report, Event Report # 46138, is attached and provides the applicable information provided at that time pursuant to 10CFR70.50(c)(1). The attachment also contains the additional information required in accordance with 10CFR70.50(c)(2).

Westinghouse continues to operate the Columbia Plant in a manner that protects the public health, safety, and the environment and views this as a compliance issue as opposed to a safety issue. If you have any questions regarding this report, please contact me at (803) 647-2045.

Sincerely,

A handwritten signature in cursive script, appearing to read "Gerard F. Couture".

Gerard F. Couture, Manager  
Licensing & Regulatory Programs  
Westinghouse Columbia Fuel Fabrication Facility  
Docket No. 70-1151, License No. SNM-1107

Attachment

cc: U. S. Nuclear Regulatory Commission  
Attn. Mr. Richard Gibson Region II  
245 Peachtree Center Avenue NE, Suite 1200  
Atlanta, Georgia 30303-1257

U. S. Nuclear Regulatory Commission  
Attn: Christopher Ryder, Project Manager  
Mail Stop: EBB 2C40M  
One White Flint North  
11555 Rockville Pike  
Rockville, Maryland 20852-2738

South Carolina - Department of Health and Environmental Control  
Attn: Susan Jenkins, Assistant Director  
Division of Waste Management  
Bureau of Land and Waste Management  
2600 Bull Street  
Columbia, SC 29201-1708

JE72

NRC Notification  
Page 1 of 1  
Fax# 301-816-5151

July 29, 2010  
Event Report # 46138  
Time 1633 EDT

**Initial Notification Report Pursuant to 10CFR50(c)(1)**

**Facility**

Westinghouse Electric Company LLC (WEC), Commercial Fuel Fabrication Facility, (CFFF) Columbia SC, low enriched ( $\leq 5.0$  wt.% U-235) fuel fabricator for commercial light water reactors. License: SNM-1107.

**Time and Date of Event**

July 28, 2010, 1400

Notification is made based on 10CFR70 Appendix A (b)(1) “Any event or condition that results in the facility being in a state that was not analyzed, was improperly analyzed, or is different from that analyzed in the Integrated Safety Analysis, and which results in failure to meet the performance requirements of 10CFR70.61.”

Westinghouse Environmental Health and Safety (EH&S) staff evaluated the compliance posture concerning the extent of condition for an open Notice of Violation (NOV) 70-1151/2009-201-01, and evaluation of the information provided in the *“Summary of the June 28, 2010, Public meeting to discuss the use of Design Features to meet the performance requirements of Title 10 of the Code of Federal Regulations part 70, Subpart H”*, (ML101950377). This evaluation identified a contradiction between the guidance and our approved SNM-1107 License and procedures. Therefore, criticality events evaluated as incredible in accordance with procedure NCS-010 *“Categorizing Potential Criticality Scenarios and Criticality Safety Significant Controls”* are no longer deemed in compliance with 10 CFR Part 70. Following the NCS-010 methodology allowed for an incredibility conclusion “based on crediting passive engineered controls or passive design features”. When the logic demonstrated that the passive control or design feature absolutely prevented the scenario from leading to a criticality, the scenario was categorized as incredible; the control was designated as a Safety Significant Control (SSC) in the Integrated Safety Analysis (ISA). SSCs are subject to Management Measures required by the SNM-1107 License to ensure they are available and reliable to perform their intended function. However, failure to identify these accident sequences as credible led to these sequences not being included in the ISA Summary, and therefore Items Relied on For Safety (IROFS) were not designated for these sequences.

**Immediate Corrective Actions**

A governing policy was issued as an interim compensatory measure to identify all current Nuclear Criticality Safety (NCS) engineered SSCs as IROFS. A currently in place NCS Facility Walk-through Assessment process, procedure RA-316, is also designated as an Administrative IROFS as a verification activity of the engineered controls.

Interim controls are being established on modifications pertaining to Criticality Safety Related SSCs to ensure no situation occurs where a modification may require NRC pre-approval.

This event has been entered into the Facility Corrective Action Process CAPS#10-210-C002.

**10CFR70.50 (c)(2) Information:**

*(2) Written report. Each licensee that makes a report required by paragraph (a) or (b) of this section, or by § 70.74 and Appendix A of this part, if applicable, shall submit a written follow-up report within 30 days of the initial report. Written reports prepared pursuant to other regulations may be submitted to fulfill this requirement if the report contains all the necessary information, and the appropriate distribution is made. These written reports must be sent to the NRC's Document Control Desk, using an appropriate method listed in § 70.5(a), with a copy to the appropriate NRC regional office listed in appendix D to part 20 of this chapter. The reports must include the following:*

*(i) Complete applicable information required by § 70.50(c)(1);*

This information provided at the time is set forth above.

*(ii) The probable cause of the event, including all factors that contributed to the event and the manufacturer and model number (if applicable) of any equipment that failed or malfunctioned;*

The event is not due to any equipment failure; rather it is tied to an analytical discrepancy when compared with the regulations. Westinghouse performed the applicable Criticality Safety Evaluations in full compliance with Westinghouse's understanding of the requirements as described within the SNM-1107 License Application. As noted in the event report, this method of determining "incredible" scenarios was outlined in the governing policy NCS-010. The non-compliance was due to events that were classified as incredible based on dependence on features of design. This determination was the culmination of a long standing difference of interpretation of the requirements between Westinghouse and the NRC. Westinghouse policy allowed for these designs to be designated as Safety Significant Controls (SSC) versus IROFS. An Apparent Cause Analysis was completed which concluded the cause of this event was: *The licensee failed to maintain an understanding of regulator interpretations.* Westinghouse thought the fundamental criteria for the safety basis was agreeable to the NRC since the NRC had approved the annual updates to the ISA summaries, the SNM-1107 license renewal in September 2007 and the ISA Methodology. This NRC approval however did not result in a common understanding of the regulations and how they were being implemented at CFFF.

NCS-010 had also been inspected by the NRC in May 2008, (IR#70-1151/2008-201) where NCS-010 was reviewed specifically to address an open URI related to incredibility discussions. "During this inspection, the inspectors reviewed NCS-010, "Categorizing Potential Criticality Scenarios and Criticality Safety Significant Controls," which contains methodology for categorizing criticality scenarios as credible, abnormal or incredible events." The URI was closed based on the application of the NCS-010 criteria and no new NOV was issued for that guidance which allowed for an incredibility conclusion "based on crediting passive engineered controls or passive design features". NCS-010 was inspected again in November 2008 (IR#70-1151/2008-204), and this specific issue had not been raised until the NOV # 70-1151/2009-201-01 was issued. Several CSEs generated and implemented based on NCS-010 criteria had been inspected since license renewal.

*(iii) Corrective actions taken or planned to prevent occurrence of similar or identical events in the future and the results of any evaluations or assessments;*

Completed Corrective Actions:

- 1) An Apparent Cause Analysis has been completed. This analysis includes an extent of condition review. The ACA analyst searched past events (CAPs database searches, interviews of personnel). The results of the extent of condition evaluation did not locate a High Level CAPS with similar causal factors in which a failed corrective action to prevent recurrence (CATPR) contributed to this event. This event is not considered a Repeat Event as defined by Westinghouse CAPs procedures.
- 2) A governing policy was issued as an interim compensatory measure to identify all current Nuclear Criticality Safety (NCS) engineered SSCs as IROFS. A currently in place NCS Facility Walk-through Assessment process, procedure RA-316, was also designated as an Administrative IROFS as a verification activity of the engineered controls. *This action restored compliance with the regulation.*
- 3) Interim controls were established on modifications pertaining to Criticality Safety Related SSCs to ensure no situation occurs where a modification may require NRC pre-approval.
- 4) Attached to this response is a CSE/ISA upgrade plan which is being formally submitted to NRC as a corrective action plan. This will be formally transmitted to NRC in a separate correspondence by the end of September 2010 along with the necessary SNM-1107 license application changes to correct the terminology in the currently approved license to match the current understanding of the regulatory wording.

*(iv) For licensees subject to Subpart H of this part, whether the event was identified and evaluated in the Integrated Safety Analysis.*

The Columbia Fuel Fabrication Facility is subject to Subpart H. As described in the body of the initial event report the potential for this type of event was recognized and discussed in the Integrated Safety Analysis. The event report deals with a potential inadequacy in that evaluation.

**ATTACHMENT B**

**Nuclear Criticality Safety Improvement Project Status Report**

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**Westinghouse CFFF Nuclear Criticality Safety Improvement Project Status Report – August 2010****1.0 Project Name**

Where appropriate throughout this documentation, this project will be referred to as the Nuclear Criticality Safety Improvement Project - II (NCSIP-II).

**2.0 Project Scope**

The scope of this project extends to all aspects of the Columbia Fuel Fabrication Facility (CFFF) Nuclear Criticality Safety (NCS) Program and pertinent Integrated Safety Analysis documents, and involves a re-evaluation of the control schemes for criticality safety, revision of the control descriptions in the Integrated Safety Analysis, including designation of appropriate Items Relied On For Safety (IROFS) for previously identified “*incredible*” scenarios. The NCSIP-II will also address appropriate implementation in plant operations, including updating the plant safety basis documentation and the plant training program. Specific areas of the NCS Program to be addressed during the completion of this project include, but are not limited to:

- CFFF NCS Policy and Philosophy
- NCS /ISA methodology requirements in the CFFF license
- NCS/ISA organization and staffing
- IROFS training for plant engineering and operations personnel
- Procedures, processes, methodologies for incorporating NCS limits and controls in the plant Integrated Safety Analyses (ISAs), focusing on appropriate designation of IROFS for previously identified “*incredible*” scenarios.

This report provides a general outline of the project plan and documents the proposed project milestones and deliverables.

**3.0 Major Milestones**

The following major milestones have been established for the NCSIP-II. The project plan is a “living” document and, as such, will be modified periodically, as appropriate, to include additional milestones or modify existing milestones. These changes will be approved by the project team and plant management. Note that these major milestones are intended to help define the major phases of the project. Specific project deliverables will be addressed in Section 5.0 of this report.

Project Milestone	Status and/or Current Target Date
Designation of compensatory measure IROFS for incredible scenarios	Complete
Develop revised SNM-1107 License Application for ISA methodology, incorporate into NCS-010 and other EH&S procedures as necessary	September 2010
Obtain additional NCS and ISA Engineers to provide project support	October 2010
Evaluate and confirm the adequacy of NCS IROFS controls and related assumptions during revisions to CSEs	July 2012
Revise applicable CSEs and issue new CSEs as deemed appropriate	July 2012 <sup>(1)</sup>
Revise applicable ISAs/ISA Summaries to capture all NCS related IROFS for previously "incredible" scenarios	July 2012
Complete necessary implementation activities	August 2012
Complete all required upgrades	• <b>Target Completion Date: 8/30/12</b>

<sup>(1)</sup> Quarterly status reports of completed CSEs/ISAs will be provided to NRC in accordance with proposed License Condition.

The project will be considered completed when all required Criticality Safety Evaluations (CSEs) and revisions to the twenty ISA/ISA Summaries are completed. The completion target date provided above for the upgrades (8/30/12) was based upon the following assumptions:

- Contract NCS and ISA Engineer positions are filled and maintained in a timely manner.
- At least two experienced NCS Engineers and one ISA engineer are made available full-time to support NCSIP-II.
- Approximately 105 revised Criticality Safety Evaluations (CSEs) and revisions to twenty ISA/ISA Summaries are required as part of the NCSIP-II effort.

#### 4.0 Resource Requirements Including Manpower Allocation

##### Manpower Resources

The EH&S Manager is responsible for overall project execution. Manpower for the NCSIP will be divided between EH&S Engineering and EH&S Licensing and Regulatory Program functions, as appropriate, during the course of the project. The EH&S department will continue to provide daily support of plant operations, and support for capital projects, while supporting the NCSIP-II in the areas of license revision, ensuring consistency with plant operations, methodology guidance, providing input to the prioritization of project activities, generating revisions to existing CSEs or new process CSEs (as appropriate), cognizant technical review of criticality safety evaluations, implementation of EH&S improvements in the plant, and providing input and direct support of related training activities.

Throughout the conduct of the project, it is anticipated that personnel resources will be required from the plant engineering and operations functions to support criticality safety evaluations, implementation of newly designated IROFS controls/programs, and training. The appropriate level of support required from these organizations will be determined at the time of need, and will be approved by the appropriate members of plant management.

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### Hardware Resources

Personnel supporting NCSIP-II will require computing resources capable of performing calculations with approved and validated NCS computer codes, such as MCNP and SCALE (KENO), as well as SAPHIRE and other supporting software and code access. This is in addition to the normal computer productivity tools (word processing, spreadsheets, e-mail, etc.).

All other required resources will be comparable to those required of other projects and engineering staff within the plant.

## **5.0 Project Deliverables (Hardware, Software, Analyses, Reports, etc.)**

The following deliverables have been established for NCSIP-II. The project plan is a “living” document and, as such, will be modified periodically, as appropriate, to include additional deliverables or modify existing deliverables. Note that these deliverables are specific items to be produced within the framework of the major milestones discussed in Section 3.0 of this report.

With a project start date of September 2010 and a scheduled completion date of August 2012, the defined project schedule is therefore 24 months. The percent of deliverables complete versus percent of schedule complete will be provided to management as a monthly Key Performance Indicator (KPI) to be used to track the progress of the NCSIP.

The following CSE listing has been established for the NCSIP. As stated previously, the project plan is a “living” document and, as such, will be modified periodically, as appropriate. Any changes to the CSE listing will be approved by the project team and management.

The corresponding ISA and ISA Summary will be completed within 30 days of completion of the CSEs that impact that process area’s ISA. Any implementation activities pertaining to any newly designated IROFS will be conducted in accordance with existing procedures upon completion of the ISA revisions.

Note that CSEs listed in **bold** were completed during the current reporting period.

CSE#	TITLE
<u>1-A</u>	Incinerator Filter Housings
<u>1-B</u>	800 CFM Portable Ventilation Unit
<u>1-C</u>	IFBA Dry Ventilation System Sources
<u>1-D</u>	Ammonia Fume Ventilation System
<u>1-E</u>	Conversion Scrubber S-1030
<u>1-F</u>	Conversion Decon Room Ventilation
<u>1-G</u>	Acid Scrubber S-2A/2B
<u>1-H</u>	SOLX Scrubber S-958
<u>1-I</u>	Chem Lab Scrubber
<u>1-J</u>	SOLX Torit
<u>1-K</u>	ADU Pellet Line Torits
<u>1-M</u>	ADU Conversion Torits
<u>1-L</u>	S-1030 Filter Housings
<u>1-N</u>	URRS Decon Room Torit
<u>1-O</u>	Pellet Inspection Hood Ventilation
<u>1-P</u>	Fluoride Stripping Scrubber S-707
<u>1-Q</u>	Bulk Blending Room Torits
<u>1-R</u>	Incinerator/ABF Torit
<u>1-S</u>	Erbia Central Vacuum Torit
<u>1-T</u>	Erbia DC-9401 Torit
<u>1-U</u>	UF6 Bay Emergency Exhaust
<u>1-V</u>	Rod Repair Torit
<u>1-W</u>	Erbia Wet Ventilation
<u>1-X</u>	Erbia Pellet Conveyor Ventilation
<u>1-Y</u>	IFBA Rod Assembly Ventilation
<u>1-Z</u>	Erbia Enclosure Ventilation FL-9404
<u>1-AA</u>	ADU Grinder Line 6 Ventilation
<u>1-AB</u>	S-1008 Filter House
<u>1-AC</u>	Erbia Exhaust Ventilation
<u>1-AD</u>	S-958 Filter House
<u>1-AE</u>	IFBA Scrubber
<u>1-AF</u>	IFBA Scrubber Filter House
<u>1-AG</u>	Chem Lab 10A Ventilation
<u>1-AH</u>	Conversion Enclosure Containment
<u>1-AI</u>	UF6 Bay Dock 4 Vent
<u>1-AJ</u>	CDL Vent
<u>1-AK</u>	1A/1B Filter Housings
<u>1-AL</u>	Chem Lab Scrubber Filter House
<u>1-AM</u>	Mobile Welding Smoke Filter
<u>1-AN</u>	IFBA DC-801 Torit Ventilation System
<u>2-A</u>	UN Bulk Storage and HF spiking
<u>3-A</u>	Autoclave Vaporizers
<u>3-C</u>	Line 4 Eductor Trial

<u>3-D</u>	ADU Conversion Hydrolysis Column with Passive Overflow, Nitrate Vessel and Precipitator
<u>3-E</u>	Decanter
<u>3-G</u>	Vaporization
<u>3-H</u>	Hot Oil Dryer (Dryer, Powder Elevator, Duplex Valves, K-tron Feeders)
<u>3-I</u>	Calciner Operation
<u>3-J</u>	Fitzmill and Product Hoods
<u>3-L</u>	Storage of Legacy 8A Cylinders
<u>3-M</u>	Q-Tanks & Filters
<u>3-N</u>	UF6 Cylinder Receipt and Handling
<u>3-O</u>	ADU Conversion Hydrolysis Column with Passive Overflow, Nitrate Vessel and Precipitator, Lines 1-4
<u>4-A</u>	Safe Geometry Dissolver System (Clean and Dirty)
<u>4-B</u>	URRS Sifting/Cleaning Hood
<u>4-E</u>	706 Hood
<u>5-A</u>	Ammonium Diurate (ADU) Bulk Blending System
<u>7-A</u>	Solvent Extraction Systems
<u>8-A</u>	Oxidation Pan Racks (Type III racks)
<u>8-B</u>	Powder Handling
<u>8-C</u>	Pellet Sintering (sintering oven, Type IV(PN) racks)
<u>8-D</u>	Pellet Grinder Line Operations
<u>8-E</u>	Pilot Line Work Station
<u>8-F</u>	Thermal Stability Ovens
<u>9-A</u>	UF6 Cylinder Cleaning and Surveying Facility
<u>9-B</u>	UF6 Cylinder Washing (Internal)
<u>10-A</u>	ADU Rod Area
<u>10-B</u>	Product Assurance Rod Inspection
<u>11-A</u>	Scrap Cage Dissolver
<u>11-B</u>	Scrap Cage Precipitation
<u>11-C</u>	Scrap Cage Washing Machine
<u>11-D</u>	Scrap Cage Tanks
<u>11-E</u>	Conversion Decontamination Room
<u>11-F</u>	Sorting Hood
<u>11-G</u>	URRS Precipitation
<u>12-A</u>	Rod Transfer Caskets
<u>12-B</u>	IFBA Drying Oven #3
<u>12-C</u>	Fuel Rod Manufacturing on Rod Line 7 in IFBA Area
<u>12-D</u>	Fuel Rod Manufacturing on Rod Line 5
<u>13-A</u>	Incinerator System
<u>13-B</u>	Spent Filter Storage, Decon/Cutting Room, and Filter Cleaning Hood
<u>13-C</u>	LLRW Misc
<u>13-E</u>	Trash Collection (including assay)
<u>14-A</u>	Material Handling (Pellet Receipt through Collating or Pre-stacking)
<u>14-B</u>	Integrated Fuel Burnable Absorber (IFBA) Coaters
<u>14-C</u>	Misc (Mop Water, Acid Stripping, Rod Scrap/Rework)
<u>14-D</u>	IFBA Pail Storage racks
<u>15-A</u>	Waste Treatment Tanks (T-1148, T-1149, and T-1147)
<u>15-B</u>	Ion Exchange Plant

<u>15-C</u>	Waste Water Treatment System (Waterglass)
<u>16-A</u>	Storage of Uranium Bearing Materials System (Polypak Storage Racks)
<u>16-B</u>	Storage of Uranium Bearing Materials System (Polypak Storage Carts)
<u>16-C</u>	Mop Buckets
<u>16-F</u>	Floor Storage of SNM
<u>16-G</u>	Archive Pellet Can Storage and Handling
<u>16-H</u>	Steel Room
<u>16-I</u>	Ventilation Clean-Out Containers
<u>16-J</u>	Inventory Sample Storage Unit
<u>17-A</u>	Rod Pipes and the Rod Casket/Rod Pipe Transfer Cart
<u>17-B</u>	Final Assembly Wash Pit
<u>17-C</u>	Final Assembly Operations
<u>17-D</u>	Final Assembly Operations involving UCON
<u>18-A</u>	Viper/PPT Lab
<u>18-B</u>	Analytical Services Laboratory
<u>18-C</u>	Met Lab
<u>18-D</u>	Chemical Development Lab
<u>18-E</u>	HP Lab
<u>18-F</u>	IFBA Chemical Lab
<u>18-G</u>	QC Lab Polypak Sampling Hood
<u>18-H</u>	Erbia Chemical Lab
<u>20-A</u>	Erbia Bulk Blending System
<u>20-B</u>	Erbia Sintering
<u>20-C</u>	Erbia Powder Handling
<u>20-D</u>	Misc Ops
<u>21-A</u>	Assembly Storage and BWR Fuel Bundle Inspection Area
<u>21-C</u>	Rod Storage and Handling (Including BWR Fabrication)
<u>21-D</u>	CFFF Packing Area
<u>99-C</u>	Oxidation Ovens and Hoods
<u>99-G</u>	Use of Inadvertent Containers
<u>99-I</u>	16KWU (Atom) Testing in the Product Engineering (PE) Development Lab

**6.0 Team Members and their Responsibilities**

<b>Team Members</b>	<b>Team Member Role</b>	<b>Team Member Major Tasks</b>
EH&S Manager	Management Sponsor,	Management support and oversight
NCS Project Lead	NCS coordination, input and execution of project deliverables	NCS input and implementation of project deliverables
EH&S Engineering Manager	Project Management	Prioritize work assignments and ensure technical compliance
Area Managers Area Engineers	Operations Management and Engineering Support and Review	Operations input and implementation of project deliverables
EH&S L&RP Manager L&RP Engineer Contract L&RP Engineer*	Regulatory and Licensing Interface ISA/ISA Summary development	Regulatory and Licensing Input ISA /ISA summary Revisions Fault Tree Analysis
NCS Engineers (4) Contract NCS Engineers (2)	CSE revisions and control selections	NCS input and execution of project deliverables

**7.0 Key Issues/Potential Problem Areas and Interim Risk Mitigation Actions**

<b>Key Issues</b>	<b>Risk Mitigation Actions</b>
Secure and maintain qualified EH&S Engineer resources to support required effort	<ul style="list-style-type: none"><li>• Continuing to make use of qualified contractor resources for other staffing needs</li></ul>
Uncertain number of required fault tree calculations and revisions	<ul style="list-style-type: none"><li>• Review existing IROFS basis, identify areas of weakness, and prioritize revisions</li><li>• Minimize new calculations to the extent possible</li></ul>
Adequate plant support personnel review CSEs, ISAs implement newly designated IROFS, etc.	<ul style="list-style-type: none"><li>• Coordinate closely with plant management</li></ul>
Project funding for limited facility modifications	<ul style="list-style-type: none"><li>• Capital funding may be required in limited cases to avoid use of administrative controls</li></ul>

**8.0 Interfacing Groups and their Responsibilities**

During the completion of this project, the NCSIP-II team will interface with the following organizations:

Interfacing Group	Interfacing Group Responsibilities
Plant Operations Organizations	<ul style="list-style-type: none"> <li>• Provide input on plant priorities</li> <li>• Provide resources to support CSEs/ISAs</li> <li>• Provide review and approval of CSEs/ISAs</li> <li>• Provide support for implementation of Project deliverables</li> </ul>
EH&S Engineering Group	<ul style="list-style-type: none"> <li>• Provide regulatory and licensing support</li> </ul>
EH&S Licensing Group	<ul style="list-style-type: none"> <li>• Provide regulatory and licensing support</li> </ul>

**9.0 Contractor / Special Regulatory Requirements**

None

**10.0 Project Deliverable Implementation Verification/Validation Method**

The implementation of deliverables associated with this project will be verified in accordance with approved Project procedures, as well as CFFF requirements with regard to ISAs, Management Measures, Quality Assurance (QA) and Configuration Management (CM).

**11.0 Project Procurements that are Unique, have Special Requirements or Require Special Attention and Training**

The primary procurements associated with this project are the contract EH&A Engineer resources that will be used to supplement the permanent Westinghouse staff EH&S Engineer resources. Through previous experience and/or normal training activities these individuals will be qualified in accordance with CFFF EH&S Engineer requirements. Therefore, there are no unique or special requirements or training associated with the acquisition of these resources.