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Westinghouse Electric Company LLC
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USA

U. S. Nuclear Regulatory Commission
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Your ref:
Our ref: LTR-RAC-11-67
November 17, 2011

SUBJECT: REPLY TO A NOTICE OF VIOLATION
REFERENCE: WESTINGHOUSE ELECTRIC COMPANY - NRC INTEGRATED
INSPECTION REPORT NO. 070-1151/2011-004 AND NOTICE OF VIOLATION

Pursuant to the provisions of 10 CFR 2.201, Westinghouse Electric Company LLC (Westinghouse) herein provides a response to your letter of October 27, 2011, regarding your inspection of the Columbia Fuel Fabrication Facility (CFFF) conducted the month of August 2011.

Appendix A provides a concise response to the violation of NRC requirements specified in the Notice of Violation (NRC Inspection Report Number 70-1151/2011-004).

Should you have any questions or require additional information, please telephone Marc A. Rosser of my Staff at (803) 647-3174.

Sincerely,

A handwritten signature in black ink, appearing to read 'David J Precht'.

David J Precht Manager
Columbia Fuel Fabrication Facility
(License SNM-1107, Docket 70-1151)

Attachment: 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
One White Flint North
11555 Rockville Pike
Rockville, Maryland 20852-2738
Mail Stop: EBB 2C40M
Attn: Christopher Ryder, Project Manager

APPENDIX A**NOTICE OF VIOLATION**

NRC Notice of Violation (NRC Inspection Report Number 70-1151/2011-004) identified a Severity Level IV Violation of NRC Requirements.

Safety Condition S-1 of Special Nuclear Material License SNM-11 07, requires that material be used in accordance with statements, representations, and conditions in the License Application, dated June 27, 2007; or as revised, pursuant to 10 CFR 70.32 or 10 CFR 70.72, and the supplements, dated July 18, 2007; September 13, 2007; April 21, 2008; June 10, 2008; September 30, 2008; August 30, 2010; October 4, 2010; September 7, 2010; November 22, 2010; December 15, 2010, January 11, 2011; February 22, 2011; April 8, 2011; and April 28, 2011.

Section 3.2.1, Maintenance Program Structure, of the License Application dated June 27, 2007, states that the basic purpose of the maintenance program is to ensure that safety significant controls (SSCs) designated as items relied on for safety (IROFS), determined by the Integrated Safety Analysis (ISA) described in Chapter 4.0 of this License Application, are installed, tested, and maintained in accordance with approved procedures.

Section 5 of the ISA Summary, Ammonium Diuranate (ADU) Conversion System, in the IROFS Table Conversion Area - Vaporization designates UF6CYL-110 as an IROFS and states that cranes, mobile lifting trucks, and any associated rigging shall have capacity to safely lift the cylinders with UF6 load, and shall be maintained, inspected, and certified appropriately. It also states that equipment used to lift UF6 cylinders is maintained, inspected, and certified appropriately to prevent failure.

Operating Procedure MCP-108217, Maintenance and Calibration Operating Procedure, Rev. 1, section 6.2.2.J, states that a sling with worn or damaged master links, coupling links or other components must be removed from service and that the slings shall also be removed from service if hooks are cracked, have been opened more than 15% of the normal throat opening or twisted more than 10 degrees from the plane of the unbent hook.

Contrary to the above, prior to August 10, 2011, the licensee failed to remove from service a sling, IROFS UF6CYL-11 0, that had a cracked hook and with a throat opening of more than 15% of the normal opening.

A.1. ACKNOWLEDGEMENT OF THE VIOLATION

Westinghouse acknowledges the violation as identified in Inspection Report and Notice of Violation.

A.2 REASON FOR THE VIOLATION

The violation occurred due to a Human Error in that a non-conservative decision was made by the subject matter expert that allowed the continued use of suspect non-compliant equipment.

A.3 CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

A number of corrective actions have been completed to enhance inspector performance, reinforce taking appropriate actions to remove suspect equipment from service and to clearly define requirements.

- 1) Maintenance and Contractor personnel met to reinforce taking appropriate actions to remove suspect equipment from service. Completed August 10, 2011
- 2) Conducted a plant wide inspection of all hooks, slings and below the hook lifting devices to ensure they met applicable OSHA 1910.184, ASME B30.10, ASME B30.9 and ASME B30.20 standards. Removed from service all hooks, slings and below the hook lifting devices that met removal criteria. Completed August 15, 2011
- 3) The original certified inspector (crane contractor) re-attended a Rigging Equipment Inspection training class at the Crane Institute in Florida and passed testing to be a Certified Inspector. Completed October 21, 2011
- 4) A second individual assigned to the Columbia Plant who works for the crane contractor attended the Rigging Equipment Inspection training class at the Crane Institute in Florida and passed testing to be a Certified Inspector. Completed October 21, 2011
- 5) Sling Inspection Preventive Maintenance (PM) work orders have been upgraded to include references to ASME removal criteria. Completed October 13, 2011
- 6) Updated all existing PMs to include additional equipment that handles UF6 Cylinders containing SNM (IROFS or not) to maintain a consistent approach. Completed October 13, 2011
- 7) Generated two new safety significant PMs, PM 85311 and PM 20648 to test additional rigging in all areas. Completed October 5, 2011
- 8) Updated the three applicable Safety Significant Control Sketches, TRS-300-1, 815417-2 & 836038-1 to clarify action Expected and to identify the additional PMs. Completed November 17, 2011

A.4 DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Compliance was achieved August 15, 2011 when the out of specification equipment was removed from service.

A.5 ACTIONS TO PREVENT RECURRENCE

The actions taken to prevent recurrence are items three through eight listed in the corrective actions above.