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Westinghouse Electric Company LLC
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U.S. Nuclear Regulatory Commission
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Office of Nuclear Material Safety and Safeguards
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July 31, 2012

SUBJECT: WESTINGHOUSE COLUMBIA PLANT INSPECTION REPORT RESPONSE

Westinghouse Electric Company LLC (Westinghouse) Columbia Fuel Fabrication Facility (CFFF) was inspected by members of your staff in April 2012. The results of this inspection were documented in INSPECTION REPORT NO. 070-1151/2012-202, dated May 22, 2012.

No violation of Nuclear Regulatory Commission (NRC) requirements was identified during the inspection which requires a written response. However, the inspectors noted a potential problem concerning Westinghouse's current process to resolve issues pertaining to Event Notice 46138. The inspectors noted a problem with an approach for crediting administrative actions as a secondary control in analysis currently in process for Nuclear Criticality Safety Improvement Project-II (NCSIP-II). Westinghouse's goal is to resolve this in a fully compliant, timely and transparent manner.

Westinghouse is in the process of eliminating engineered controls from incredible scenarios. Westinghouse has been informed by NRC that the current methodology of measurement verification as an IROFS for passive geometry IROFS is inconsistent with the requirements of 10CFR70. These measurements are considered management measures and not independent IROFS. As stated in NUREG-1520, Rev 1, Section 5.4.3.2, Page 5-14, these dimensions are verified prior to operation, but configuration control should be used to maintain these dimensions.

The proposed path forward consists of revising the NCS Manual, Section NCS-017, which prescribes the use of the aforementioned methodology. Specifically, the following will be included in NCS-017:

- Favorable geometry equipment that maintains sub-criticality by design (i.e., dimensions, spacing, and interaction) will be designated as IROFS. Failure of configuration control of the equipment is not considered an accident sequence and therefore these IROFS would not be classified as sole IROFS. Sole IROFS are defined as the sole item preventing or mitigating an accident sequence.
- Favorable geometry equipment having credible accident sequences (e.g., corrosion, bulging, leakage, etc.) that could lead to criticality must meet both the double contingency principle and the performance requirements, as required by 10CFR70.61.

- Passive engineered equipment that is designated as a Sole IROFS shall have a description of the attributes associated with the safety function. As required by 10CFR70.72, an evaluation of whether a proposed plant change constitutes an alteration of a Sole IROFS will be performed as part of the plant configuration change management system. Alteration will be defined as described in Regulatory Guide 3.74; any change to the IROFS that will modify, positively or negatively, any of the attributes associated with the safety function of the IROFS.

As stated previously, NRC has informed us that our current measurement verification methodology is not compliant with 10CFR70. Revising the measurement verification scenarios is a significant task that will affect over fifty percent of 120 CSEs. Considering the current NCS staffing level and the necessity to provide adequate plant support, this effort will require an extension of the NCSIP -II deadline. An extension for completion of SNM-1107 Safety Condition S-7 to December 31, 2014 is required to incorporate these changes concurrent with the seismic and natural phenomena evaluation schedule. The applicable sections of the revised analysis (e.g. IROFS listing) would then be submitted to the NRC in the Integrated Safety Analysis Summaries by no later than January 31, 2015 as part of the annual submittal required by 10 CFR 70.72 (d)(2).

Sincerely,



Gerard F. Couture,
Licensing Manager
Columbia Fuel Fabrication Facility
(License SNM-1107, Docket 70-1151)

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