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Our ref: LTR-RAC-14-3

Date: January 14, 2014

SUBJECT: WESTINGHOUSE 10 CFR 70.72 FACILITY CHANGE REPORT

Westinghouse Electric Company LLC (Westinghouse) hereby submits the report of Columbia Fuel Fabrication Facility (CFFF) changes that did not require Nuclear Regulatory Commission (NRC) pre-approval in accordance with 10 CFR 70.72. This report addresses those changes completed within calendar year 2013. Westinghouse had no facility process changes that required NRC pre-approval during this time period.

Westinghouse uses an integrated safety review approach for all modifications of, or additions to, existing structures, systems and components at the CFFF. This process is described in, and conducted in accordance with the requirements of CFFF Regulatory Procedure RA-104, "*Regulatory Review of Configuration Change Authorizations.*" This integrated review is conducted by the various regulatory disciplines, to include Radiation Safety, Environmental Protection, Nuclear Criticality Safety, Safeguards, Fire Safety, Chemical/Industrial Safety and other applicable Health and Safety experts when necessary. The Manager of the Environmental Health & Safety (EH&S) Department further assures regulatory requirements are satisfied and provides final EH&S approval of the Configuration Change Form (CCF). A key aspect of this review is a determination if the change is not prohibited by: 10 CFR 70, a SNM-1107 license condition, or a governing order. The reviewers decide whether NRC pre-approval and SNM-1107 license amendment changes are required prior to implementation.

Specific guidance is also provided to ensure that NRC pre-approval is obtained for changes that:

- create new types of accident sequences that, unless mitigated or prevented, would exceed the performance requirements of 10CFR70.61 and that have not been previously described in the ISA Summary;
- use new processes, technologies or control systems for which the licensee has no prior experience;
- remove an Item Relied On For Safety in the ISA Summary without at least an equivalent replacement of the safety function; or
- alter an Item Relied On For Safety that is the sole item preventing or mitigating an accident sequence that exceeds the performance requirements of 10CFR70.61.

All of the changes identified in the attachment to this correspondence were evaluated in accordance with this procedure, and a determination was made that NRC pre-approval of the respective change was not required. This determination was documented on each change authorization form by the appropriate regulatory engineering review functions. For all of these changes, the regulatory engineering review function checked the "No" box on the form for "NRC pre-approval required?".

If you have any questions, please contact me at (803) 647-3338.

Sincerely,



Nancy Blair Parr, Manager
Licensing
Westinghouse Columbia Fuel Fabrication Facility
Docket 70-1151 License SNM -1107

Attachment: Westinghouse CFFF 2013 Facility Change Report 120 pages

cc:

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