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Our ref: LTR-RAC-14-35

~~Security-Related Information Notice~~

Enclosure 4 to this letter contains ~~security-related information~~ which is to be withheld from public disclosure in accordance with RIS 2005-31. The balance of this letter may be considered public upon removal of Enclosure 4.

July 02, 2014

SUBJECT: WESTINGHOUSE LICENSE SNM-1107 AMENDMENT REQUEST (DOCKET 70-1151)

Westinghouse Electric Company LLC (Westinghouse) hereby requests an amendment to our Columbia Fuel Fabrication Facility (CFFF) SNM-1107 license application. This amendment to our license application is requested to allow the use of nurse practitioners for determination of individual medical fitness to wear respiratory protection and also to change the radiation protection instrumentation calibration frequency to an annual calibration. Lastly, an administrative change is requested to clarify the type of performance indicators documented for short-term ALARA progress. The changes to the SNM-1107 license application are identified by revision lines in the margin.

Use of Nurse Practitioner:

For the use of nurse practitioners, a change to Section 5.2.57 is requested whereas determination is performed by a nurse practitioner prior to the initial fitting of respirators, and periodically at a frequency determined by a physician to assure that the individual user is medically fit to use the respiratory protection equipment. The South Carolina Nurse Practice Act, Title 40-Professions and Occupations, states that a licensed nurse practitioner performing delegated medical acts must do so under the general supervision of a licensed physician who must be readily available for consultation.

This request follows the guidance provided in the Regulatory Guide 8.15 (NRC, 1999), which describes programs that meet the requirements of 10 CFR 20.1703, as well as concurrent requirements of the Occupational Safety and Health Administration (OSHA) listed in 29 CFR 1910.134, "Respiratory Protection." A similar request was granted to the Babcock & Wilcox Nuclear Operations Group, Inc. in 2012.

Attached are copies of the contract medical service provider's protocols for occupational health nurse practitioner (Enclosure 1), the South Carolina Nurse Practice Act, Title 40-Professions and Occupations (Enclosure 2), and a change to the contract medical service provider's purchase order in which criteria for physician supervision and support of the nurse practitioner are specified (Enclosure 3).

Instrument Calibration:

Also requested is a change to address a modification to Section 5.2.59 whereas radiation protection instruments' calibrations would be performed annually rather than the current semiannual frequency.

This request follows the guidance provided in the American National Standard (ANS), Radiation Protection Instrument Test and Calibration, Portable Survey Instruments (ANSI N323A-1997) as mentioned in Regulatory Guide 8.24, Health Physics Surveys During Enriched Uranium-235 Processing and Fuel Fabrication, Rev 2. Specifically, this standard requires annual portable survey instrument calibration as well as calibration after any maintenance or adjustment that can affect instrument performance (Section 4.9, Calibration Frequency). This ANSI (and calibration frequency) is endorsed by the Nuclear Regulatory Commission (NRC).

The vendor providing calibrations services for the portable survey instruments states their Company follows the guidance provided in ANSI N323A, 1997. The sources used in the calibration process are NIST traceable. Furthermore, employees performing instrument calibrations have experience in electronics and receive on the job training to meet certain qualifications as needed. Calibration certificates for the instruments are provided by the vendor and are maintained in EH&S records.

Portable survey instruments are response tested daily or prior to use if the instrument is used intermittently. Response testing is performed in accordance with the above referenced ANSI standard. Procedures require that any instrument not passing the response test criteria be removed from service, tagged and sent for repair, maintenance and/or recalibration. Therefore, the operability and confidence in acceptable instrumentation is continually verified. Changing the calibration frequency from semi-annual to annual will not result in degradation of instrument performance or a reduction in assurance that the instruments are performing as required. The proposed change does not adversely affect employee or public health and safety or the environment.

Administrative Change:

A clarification to Section 5.2.5 was made to add the word "radiological". This change is administrative in nature and was made to reduce ambiguity in the interpretation of the license application.

If you have any questions regarding the details of this amendment request, please contact me at (803) 647-3338.

Sincerely,



Nancy Blair Parr, Manager

Licensing

Westinghouse Columbia Fuel Fabrication Facility

Docket 70-1151 License SNM -1107

Enclosures

1. Contract for Medical Services Provider
2. South Carolina Nurse Practice Act Title 40
3. Healthworks' Change to Purchase Order
4. Revised SNM-1107 Application Sections (Security-Related SUNSI)

Enclosure 4 transmitted herewith contain(s) ~~Security Related - Sensitive Unclassified Non - Safeguards Information (SUNSI) subject to Withholding under 10 CFR 2.390.~~

cc:

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