

September 23, 2014

NOTE

FROM: Christopher Ryder, Licensing Project Manager

SUBJECT: Exemption From 10 CFR 20.1703(c)(5): Clarifying Response to a Request of Additional Information

Date and Time

September 16, 2014  
2:45 PM (eastern)

Participants

NRC	Westinghouse
Christopher Ryder <sup>(a)</sup>	Nancy Parr <sup>(a)</sup>
Gregory Chapman <sup>(b)</sup>	

Notes

- a. Licensing Project Manager
- b. Technical Reviewer

Background

Westinghouse Columbia Fuel Fabrication Facility (hereafter referred to as Westinghouse or licensee) in Hopkins, SC, had submitted a request (Ref. 1) to be exempt from 10 CFR, Part 20.1703(c)(5), which requires that a physician certify that Westinghouse employees are able to use respiratory protection equipment; instead, the licensee seeks to have a nurse practitioner perform the certification.

The purpose of the conference call was to establish that the response to the request for additional information (RAI) meet the expectations of the staff at the U.S. Nuclear Regulatory Commission (NRC). C. Ryder began the discussion by stating that the NRC staff would be acknowledging their expectations, not be making suggestions or recommendations.

RAIs had been sent to Westinghouse by letter dated August 22, 2014 (Ref. 2). N. Parr had sent a draft version of a document to facilitate the discussion.

Discussion

At the request of G. Chapman, N. Parr clarified that the draft page was to replace Item 5 of their advance protocol for the nurse practitioner. The page is not a purchase order for services. When implemented, the protocol would be signed by both the physician(s) and the nurse practitioner(s).

Westinghouse intends to formally respond to the RAIs. The NRC staff clarified that there is no need for Westinghouse to have both the physician and the nurse sign the protocol that is sent to the NRC. The signed protocol is to be kept at the Columbia facility when the exemption is granted. Westinghouse intends to submit the excerpt of procedure SYP-218 per the second RAI.

## References

1. Letter from N. Parr, Westinghouse Electric Company, LLC, "Westinghouse License SNM-1107 Exemption Request (Docket 70-1151), July 18, 2014. ADAMS accession number ML14199A593.
2. Letter from C. Ryder, U.S. Nuclear Regulatory Commission, to N. Parr, Westinghouse Electric Company, "Request For Additional Information: Request For An Exemption From Title 10 Of The Code Of Federal Regulations, Part 20.1703(C)(5) (Technical Assignment Control Number L33340)", August 22, 2014. ADAMS accession number ML14226A110.