



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION II
245 PEACHTREE CENTER AVENUE NE, SUITE 1200
ATLANTA, GEORGIA 30303-1257

January 29, 2016

Mr. David Precht
Vice President, Columbia Fuel Operations and
Manager, Columbia Plant
Westinghouse Electric Company
5801 Bluff Road
Hopkins, SC 29061

**SUBJECT: WESTINGHOUSE ELECTRIC COMPANY – NUCLEAR REGULATORY
COMMISSION INSPECTION REPORT 70-1151/2015-005**

Dear Mr. Precht:

The Nuclear Regulatory Commission (NRC) conducted announced inspections during the fourth quarter of calendar year 2015 (October 1 - December 31, 2015), at the Westinghouse Columbia Fuel Fabrication Facility in Hopkins, SC. The purpose of these inspections was to review implementation of programs and procedures for Radiation Protection, Effluent Control and Environmental Protection and Transportation. The reviews were conducted to determine whether licensed activities were conducted safely and in accordance with NRC requirements. The enclosed report presents the results of these inspections. At the conclusion of these inspections, the results were discussed with you and members of your staff at an exit meeting on November 19, 2015.

During the inspections, NRC staff examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. The inspections consisted of facility walk-downs; selective examinations of relevant procedures and records; interviews with plant personnel; and plant observations. Throughout the inspections, observations were discussed with your managers and staff. Based on the results of the inspection, no violations of significance were identified.

In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 2.390 of NRC's "Rules of Practice and Procedure," a copy of this letter and enclosure will be made available electronically for public inspection in the NRC Public Document Room, or from the NRC's Agencywide Documents Access and Management System (ADAMS), which is accessible from the NRC Website at <http://www.nrc.gov/reading-rm/adams.html>.

If you have any questions, please call me at (404) 997-4555.

Sincerely,

/RA/

Eric C. Michel, Chief
Projects Branch 2
Division of Fuel Facility Inspection

Docket No. 70-1151
License No. SNM-1107

Enclosure:
NRC Inspection Report 70-1151/2015-005
w/Supplemental Information

cc: (See page 3)

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U. S. NUCLEAR REGULATORY COMMISSION
REGION II

Docket No.: 70-1151

License No.: SNM-1107

Report No.: 70-1151/2015-005

Licensee: Westinghouse Electric Company

Facility: Columbia Fuel Fabrication Facility

Location: Hopkins, SC 29061

Dates: October 1 through December 31, 2015

Inspectors: G. Goff, Fuel Facility Inspector (Section A.3 and B.2)
K. Kirchbaum, Fuel Facility Inspector (Section A.2 and B.1)
N. Peterka, Fuel Facility Inspector (Section A.1)

Approved by: E. Michel, Chief
Projects Branch 2
Division of Fuel Facility Inspection

Enclosure

EXECUTIVE SUMMARY

Westinghouse Electric Company
Columbia Fuel Fabrication Facility
NRC Integrated Inspection Report 70-1151/2015-005
October 1 through December 31, 2015

Inspections were conducted by Nuclear Regulatory Commission (NRC) regional inspectors during normal shifts. During the inspection period, normal production activities were ongoing. The announced inspection consisted of a selective examination of procedures and representative records, observations of activities, and interviews with licensee personnel. No violations of significance were identified.

Radiation Protection

- The Radiation Protection program was implemented in accordance with the license application and regulatory requirements. (Paragraph A.1)

Environmental Protection

- The Environmental Protection program was implemented in accordance with the licensee application and regulatory requirements. (Paragraph A.2)

Transportation

- Shipments of radioactive materials were prepared and shipped in accordance with applicable regulations and licensee procedures. Certificates of compliance were maintained current. Shipping records were properly completed and maintained in accordance with applicable regulations. (Paragraph A.3)

Attachment:

Key Points of Contact

List of Items Opened, Closed, and Discussed

Inspection Procedures Used

Documents Reviewed

REPORT DETAILS

Summary of Plant Status

The Westinghouse Facility converts uranium hexafluoride (UF₆) into uranium dioxide using a wet conversion process and fabricates fuel assemblies for use in commercial nuclear power reactors. During the inspection period, normal production activities were ongoing.

A. Radiological Controls

1. Radiation Protection (Inspection Procedure (IP) 88030)

a. Inspection Scope and Observations

The inspectors performed Appendix 'B', Exposure Controls and Dose Analysis, in accordance with IP 88030. This appendix is performed on a biennial basis and alternates with Appendix 'A' of the same inspection procedure.

The inspectors verified that the licensee used administrative and engineered controls to limit occupational doses as low as reasonable achievable (ALARA) per 10 Code of Federal Regulations (CFR) 20.1101(b). The inspectors observed the handling of uranium powder where both respirators and ventilation hoods were used as administrative and engineered controls. The inspectors also reviewed the licensee's ventilation program and concluded the program was being adequately implemented per the license requirements.

The inspectors reviewed the licensee's air sampling program for monitoring concentrations of radioactive material and the inclusion of the data into internal dose calculations for workers. The inspectors discussed the management of the air sampling program with the radiation protection staff, which included a discussion of air sampling locations, assignment of dose based on an operator's time in a specific airborne radioactivity area, and the aerosol particle size assumed for the various uranium compounds processed on-site. Inspectors accompanied a member of the radiation protection staff during a change out of air samples and observed air sampling equipment condition inside the radiologically controlled area. The radiation protection staff were knowledgeable of the procedures for changing, preparing, and processing the air samples for inclusion into the internal dose calculations. The inspectors concluded the licensee's air sampling program was adequately implemented.

The inspectors reviewed the implementation of the respiratory protection program. The inspectors interviewed employees on the preparation and use of respirators in the plant and reviewed respiratory protection training and procedures. The inspectors determined that the licensee was appropriately requiring medical evaluation of respirator users, fit testing, and user seal checks in accordance with 10 CFR 20.1703. The inspectors also determined that the respirators were tested and certified by the National Institute for Occupational Safety and Health (NIOSH). The inspectors concluded that the Respiratory Protection Program was adequately implemented.

The inspectors reviewed the licensee's ALARA program to determine if the program and ALARA goals were developed and implemented in accordance with the license conditions. The inspectors reviewed the Radiological Protection Program and determined that the program performance was reviewed, at least annually to comply with 10 CFR 20.1101. The inspectors verified that the licensee conducted ALARA Committee meetings, detailing ALARA goals and exposure summaries to identify undesirable trends, on a quarterly basis. The inspectors interviewed the manager responsible for the ALARA evaluations and assessments and determined that the evaluations and assessments were being adequately implemented.

The inspectors reviewed selected personnel exposure data and verified that exposures were maintained ALARA and within the limits of 10 CFR 20.1201. The inspectors reviewed the Total Effective Dose Equivalent results and determined that they were less than regulatory limit of 5 Roentgen equivalent man (rem)/yr. In addition, it was confirmed that the Lens Dose Equivalent and Shallow Dose Equivalent results were less than the regulatory limit of 15 rem/yr and 50 rem/yr, respectively, for workers. The inspectors verified that the licensee's dosimeter provider was certified by the National Voluntary Laboratory Accreditation Program (NVLAP).

The inspectors reviewed the licensee's bioassay program and the adequacy of personnel internal exposure assessments. The inspectors reviewed procedures and documentation associated with internal exposure calculations, which included the input of data from the air sampling program and bioassay data from in-vitro results. The inspectors interviewed the individuals responsible for the review and maintenance of bioassay exposure records and internal exposure calculations and found the individuals to be knowledgeable of the process and program requirements. The inspectors concluded the bioassay program and internal exposure assessments were adequately implemented.

b. Conclusion

No violations of significance were identified.

2. Effluent Control and Environmental Protection (IP 88045)

a. Inspection Scope and Observations

The inspectors verified that the licensee had established and implemented an environmental protection program in accordance with the license application. The inspectors found no significant changes to the environmental protection program since the previous environmental protection inspection. The inspectors reviewed the licensee's internal audit of third party vendors that perform the laboratory analysis for liquid, sediment, and fish samples and noted these audits were performed at the correct frequency. The inspectors also noted that audit findings were entered into the corrective action program and opportunities for improvement were passed onto the vendors. The inspectors also reviewed the internal audit of the environmental program.

The inspectors reviewed the calendar year 2014 and the first half of calendar year 2015 semi-annual effluent reports and determined that the licensee was in compliance with 10 CFR 70.59. The inspectors reviewed the semi-annual effluent reports that are used to calculate the maximum possible dose of a member of the public at the fence line from the normal gaseous effluent releases and noted that the value was below the regulatory

requirement of 10 CFR 20.1101 (d). The inspectors reviewed the calibration and control program for effluent stack differential pressure indicators and verified that effluent stack filters were being replaced within the required frequency. The inspectors reviewed the licensee's liquid effluent discharge records and calculations and noted that the releases were below regulatory limits.

An inspection of all environmental monitoring stations was performed to ensure the equipment was in good material condition and functioning properly. The inspectors reviewed the public dose assessment and determined that the average annual effluent concentrations released in 2015 did not exceed the values specified in Appendix B of 10 CFR Part 20.

The inspectors observed a technician obtain liquid effluent and air monitoring samples and demonstrate how the sample results were processed and used to calculate the semi-annual effluent report. The inspectors verified that all sample activities were completed per approved procedures and were in compliance with the licensee requirements.

b. Conclusion

No violations of significance were identified.

3. Transportation of Radioactive Material (IP 86740)

a. Inspection Scope and Observations

Through observations, document reviews, and interviews, the inspectors determined the licensee had established and maintained an effective program to ensure radiological and nuclear safety during the receipt, packaging, and delivery of licensed radioactive materials. The inspectors also confirmed that transportation activities were in compliance with the applicable transport regulations.

The inspectors reviewed shipping records involving the incoming and outgoing shipments of special nuclear material products. The licensee ensured that the appropriate documentation accompanied the outgoing shipments by recording the required information on the packaging and shipping orders including the transportation index, package activity, labeling, and placards. Inspectors observed that tamper seals were inspected by the licensee on all shipments. Shipping records were confirmed to comply with the storage and retention requirements of 10 CFR 61.80 and 10 CFR 71.135, respectively.

The inspectors reviewed training records to ensure that the licensee had administered 49 CFR 172.704 hazardous materials transportation training to applicable personnel as required by their license and the United States Department of Transportation (US DOT). Specifically, the inspectors observed the incoming shipments of full UB-30 cylinders (in UX-30 over packs) and LR-230 containers and outgoing shipments of fuel rods and UB-30 heeled cylinders. The inspectors also observed the opening of the UX-30 overpacks on the UF₆ pad and the loading/unloading of UB-30 cylinders at the washing station. Procedures associated with these activities were reviewed, found to be adequate, and properly implemented by licensee personnel. The inspectors observed radiological surveys being performed by licensee personnel in accordance with written procedures.

The inspectors verified that the licensee met the 10 CFR 71.21 conditions required to use the general license provision for transport of licensed material in a foreign approved package. The inspector reviewed audits of the transportation program and determined the licensee was performing the required periodic audits of the program as required. The results of the audits were appropriately addressed in the corrective action program.

The inspectors also reviewed an on-site trailer accident related to fuel damaged during shipping operations. There was no Event Report number associated with this incident since the issue occurred on-site with no compromise to nuclear safety. Corrective actions associated with this issue were reviewed by the inspectors and determined to be adequate.

b. Conclusion

No violations of significance were identified.

B. Special Topics

1. Follow-up on Previously Identified Issues

a. (Closed) Unresolved Item (URI) 2014-005-01, "Stack Monitoring of Waterglass Process"

During the 2014 Environmental Inspection, NRC Inspectors found the licensee was not monitoring the Water Glass Process effluent ventilation stack for radiological constituents. This issue was determined to be a violation of the license which states, in part, that effluent discharges that may release radiological material will be monitored. The licensee installed a permanent monitoring station and verified through sampling that there was an extremely low probability of any radiological material release via this process. This sampling point remains in service to monitor the Waterglass Process. This violation was evaluated as minor in significance. This failure to comply with the license constitutes a minor violation that is not subject to enforcement in accordance with the "NRC Enforcement Policy". This item is considered closed.

2. Event Follow-up

a. (Closed) Licensee Event Report (LER) 2015-002, "Missing Tamper-Seals on Empty LR-230 Container"

Westinghouse Electric Company (WEC) reported that conditions of approval in Certificate of Compliance (CoC) #9291 for the Liqui-Rad (LR) Transport Unit Package were not followed during a shipment. After being emptied at WEC, nine Liqui-Rad Transport Unit Packages were shipped to Nuclear Fuel Services (NFS) in Erwin, Tennessee, on August 11, 2015. Upon receipt, NFS personnel observed that the required security seals were not applied to one package (serial #LR-016). NFS notified WEC of this issue on August 12, 2015. Upon further investigation, one of the package's security seal was found lying on the transport trailer, and the package's other security seal was found lying on top of another package. Although the package had been emptied, it was estimated that 36 ml of residual low enriched uranyl nitrate aqueous solution may have been present. The inspectors reviewed the event and determined that the licensee failed to follow an operating procedure for preparing a package for shipment and operations. The inspectors noted that the package arrived at the receipt

facility without incident. The inspectors also reviewed corrective actions taken by WEC which included evaluating the strength of the security seals, revising procedures to include space for both operators to initial the security seal verification, an independent verification, and personnel training. The corrective actions, along with the "60-Day Written Notification of Event" report, were determined to be adequate. Failure to comply with the operating procedure constitutes a minor violation that is not subject to enforcement action in accordance with the NRC Enforcement Policy. This item is closed.

C. Exit Meeting

The inspection scope and results were presented to members of the licensee's staff at various meetings throughout the inspection period and were summarized on November 19, 2015, to D. Precht and staff. The inspectors received no dissenting comments from the licensee. Proprietary and security related information were discussed but not included in the report.

SUPPLEMENTAL INFORMATION

1. KEY POINTS OF CONTACT

<u>Name</u>	<u>Title</u>
G. Byrd	Licensing Engineer
F. Clark	Operation & Logistics Lead, Nuclear Fuel Transport
B. Hempy	Principal Engineer
C. Hopkins	U.S. Transport Manager, Nuclear Fuel Transport
J. Howell	Environmental, Health and Safety (EH&S) Manager
N. Parr	Licensing Manager
A. Pearson	EH&S Operations Manager, Radiation Safety Officer
T. Ross	Radioactive Transport Compliance, Nuclear Fuel
W. Sepitko	Mechanical Operations Manager
T. Sloma	Transportation Contractor; License, Compliance, and Package Technology; Nuclear Fuel Transport
C. Snyder	Nuclear Criticality Safety Manager
W. Stilwell	Nuclear Fuel Transport Director
D. Wagoner	Radiation Safety Engineer
C. Wheeler	Senior Nuclear Transport Specialist, Nuclear Fuel Transport

Other licensee employees contacted included engineers, technicians, production staff, and office personnel.

2. LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Closed

70-1151/2014-005-01	URI	Stack Monitoring of Waterglass Process (Paragraph B.1.a)
70-1151/2015-002	LER	Missing Tamper-Seals on Empty LR-230 Container (Paragraph B.2.a)

3. INSPECTION PROCEDURE USED

IP 88030, Radiation Protection
IP 88045, Effluent Control and Environmental Protection
IP 86740, Transportation

4. DOCUMENTS REVIEWED

Records:

AHQ-0000523, 2015 Fuel Shipments, Revision (Rev.) 0.
Annual Radiation Protection Program Review, Calendar Year 2014, dated October 29, 2015
EHS-AUDIT-15-5. EH&S Audit of the Environmental Protection Program, dated May 1, 2015
EHS-AUDIT-15-12, Environment Health & Safety Audit for the Radiation Safety Program, dated October 12, 2015

EHS-AUDIT-15-63, Supplier Audit of General Engineering Laboratories, LLC, dated August 26, 2015
 EHS-AUDIT-15-68, EH&S Audit of Unitech Services Group, dated September 24, 2015
 LIQUIRAD Shipments, dated 2015
 LTR-EHS-14-86, Supplier Audit of Carolina Technical Services, Inc., dated December 10, 2014
 LTR-EHS-15-15, CY 2014 4th Quarter ALARA Report, dated February 25, 2015
 LTR-EHS-15-18, Prospective Analysis - Monitoring Requirements for 2015
 LTR-EHS-15-31, Annual ALARA Committee Meeting Minutes, dated March 31, 2015
 LTR-EHS-15-47, CY 2015 1st Quarter ALARA Report, dated May 20, 2015
 LTR-EHS-15-64, CY 2015 2nd Quarter ALARA Report, dated September 1, 2015
 LTR-EHS-15-60, Supplier Audit of Carolina Technical Services, dated August 17, 2015
 LTR-EHS-15-83, Evaluation of Need to Sample the S-1190 Gaseous Effluent, dated November 12, 2015
 LTR-RAC-15-15, NRC Semi-annual Discharge Report, July 2014 – December 2014, dated February 27, 2015
 LTR-RAC-14-42, NRC Semi-annual Discharge Report, January 2014 – June 2014, dated August 28, 2014
 LTR-RAC-15-44, NRC Semi-annual Discharge Report, January 2015 – June 2015, dated August 26, 2015
 NRC Audit, RAD Waste Shipping and Transportation, dated October 20-23, 2014
 ROF-01-028-6, Flowmeter Verification for Roof Board, dated June 23, 2015
 Supplier Audit of WCS, LLC, dated May 18, 2015
 TR-100 - Shipment of Radioactive Materials - General Guidance For Regulatory Compliance (Training Record)
 TR-200 - Shipment of Nuclear Reactor Fuel Rods/Assemblies - Specific Requirements for Regulatory Compliance (Training Record)
 TR-202 - Shipment of Uranium Hexafluoride (UF₆) - Specific Requirements for Regulatory Compliance (Training Record)
 TR-209 - Load UF₆ Cylinders (Training Record)
 TRN-046 - Hazardous Materials Employee Training (Training Record)
 UF₆ & Miscellaneous RAD Shipments, dated 2015
 WEC-13-03 (Audit), Nuclear Fuel Part 71 Transport, dated March 5, 2014
 WEC 18.1, Internal Quality Assurance Audits, Rev. 4.

Procedures:

CA-192, Columbia Plant Hazardous Materials Transportation, Rev. 6, dated September 15, 2011
 CA-192-1, Columbia Plant Transportation Program (Administrative Procedure Sketch), Rev. 4, dated September 15, 2011
 CF-83-134, Instructions for Preparing Containers for Shipment, Rev. 9, dated October 13, 2015
 COP-831010, Shipping Low Level Radioactive Waste, Rev. 30, dated October 1, 2015
 COP-831205, Filling, Sampling and Discharging East, North, and South Lagoons, Rev. 36
 COP-836047, Uranyl Nitrate Offloading from LR-230 Containers, Rev. 10, dated October 29, 2015
 MCP-202036, River Discharge Calibration, Rev. 13
 MCP-202063, Aerator and River Discharge pH Calibration, Rev. 11
 MCP-202155, Magnehilic and Photohelic Differential Pressure Gauges, Rev. 6
 RA-204, Bioassay Program, Rev. 14, dated March 20, 2008
 RA-206, Personnel Dosimetry Program, Rev. 16, dated June 13, 2013

RA-213, Radiation Signs and Postings, Rev. 8, dated May 7, 2015
 RA-219, ALARA Program, Rev. 3, dated August 17, 2006
 RA-219-1, ALARA Goals, Rev. 12, dated April 16, 2015
 RA-222, Routine In vivo Count Program, Rev. 11, dated December 6, 2007
 RA-223, Routine Urine Sampling Program, Rev. 9, dated January 20, 2011
 ROP-01-024, Operation of TENNELECS W/Eclipse Software, Rev. 8
 ROP-01-025, Calibration of the TENNELEC Automatic Sample Counters, Rev. 18
 ROP-01-026, TENNELEC Background and Efficiency Operations, Rev. 16
 ROP-01-028, Calibration Verification of Flowmeters, Rev. 11
 ROP-01-025, Calibration of TENNELEC Automatic Sample Counters, Rev. 18, dated
 December 20, 2012
 ROP-01-028, Calibration Verification of Flowmeters, Rev. 11, dated January 31, 2012
 ROP-01-050, Operation of the Quantifit Personnel Respirator Leak Rate Analyzer,
 Rev. 15, dated May 30, 2015
 ROP-03-002, Personnel Exposure System – Guide, Rev. 4, dated May 29, 2014
 ROP-04-007, Performing In vivo Counts, Rev. 12, dated March 21, 2013
 ROP-04-009, In vivo Lung Counter Daily QA Checks, Rev. 9, dated June 21, 2015
 ROP-05-001, Preparation and Analysis of In-Plant Air Samples, Rev. 15, dated
 August 7, 2008
 ROP-05-028, Employee Work Restrictions, Rev. 19, dated November 6, 2014
 ROP-05-060, Ventilation Velocity Checks, Rev. 13, dated March 19, 2015
 ROP-04-015, Elevated Air Sample Investigation, Rev. 8
 ROP-05-004, Determining Gross Alpha & Beta Activity of an Aqueous Sample, Rev. 18
 ROP-06-001, NPDES Daily, Weekly, and Monthly Effluent Sample Collection, Rev 41
 ROP-06-002, Roof Effluent Air Sampling and Counting, Rev. 24
 ROP-06-003, Ambient Environmental Air Monitoring for Radioactivity, Rev. 12
 ROP-06-006, Collection of Routine Weekly and Monthly Environmental Samples,
 Rev. 24
 ROP-06-007, Revision 21, Groundwater Well Sampling
 RA-108-9, Ventilation and Scrubbing Safety Significant Control Sketch, Rev. 60
 QA-600-3, Quality Assurance Program for Packaging Used in the Transport of
 Radioactive Material List of Implementing Procedures, Rev. 6, dated February 22,
 2012
 SYP-218, Respiratory Protection, Rev. 11, dated January 22, 2015
 TR-003, US Transport Operations Services Request, Rev. 0, dated May 22, 2003
 TR-014, Columbia Transport Operations US Logistics – Record Generation, Retention
 and Control, Rev. 0, dated July 2, 2009
 TR-100, Shipment of Radioactive Materials General Guidance for Regulatory
 Compliance, Rev. 16, dated September 29, 2011
 TR-101, Receipt of Radioactive Materials General Guidance for Regulatory Compliance,
 Rev. 8, dated October 27, 2005
 TR-201, Shipment of Empty Radioactive Material Packagings Specific Requirements for
 Regulatory Compliance, Rev. 16, dated June 17, 2010
 TR-202, Shipment of Uranium Hexafluoride (UF₆) Specific Requirements for Regulatory
 Compliance, Rev. 18, dated May 31, 2012
 TR-209, Load UF₆ Cylinders, Rev. 11, dated September 6, 2012
 TR-212, Load Fuel Cells, Rev. 21, dated December 19, 2013
 TR-212-3, Fuel Package Tie-Down Equipment Guidelines, Rev. 1, dated October 25,
 2013
 TR-300, Unload UF₆ Cylinders, Rev. 21, dated December 19, 2013
 TR-303, Move UF₆ Cylinders, Rev. 14, dated May 15, 2014
 TR-306, Maintain UX-30 Overpacks, Rev. 9, dated October 11, 2012

TR-501, Shipment of Liquid Low Enriched Uranium Specific Requirements for
Regulatory Compliance, Rev. 5, dated October 25, 2013
TR-600, Hazardous Material Transport Security Plan, Rev. 4, dated February 26, 2014

Condition Report Written as a Result of the Inspection:

100343779
100357366

Condition Reports Review:

69301, 100041127, 100041145, 100054665, 100054706, 100062778, 100065638,
100070234, 100071466, 100072260, 100079429, 100083812, 100311987, 100312000,
100312001, 100313635, 100319499, 100326936

Other Documents:

Certificates of Compliance (C of Cs):

9196, Rev. 29
9239, Rev. 18
9291, Rev. 9
9297, Revs. 7 and 8

DOT Certificate of Compliance for 30B cylinders

Event Report - Docket 71-9239, Certificate of Compliance USA/9239/AF
(10 CFR 71.95 report), dated November 16, 2015

Event Report - Docket 71-9291, Certificate of Compliance USA/9291/B(U)F-96,
LIQUI-Rad (LR) Transport Unit Package, dated October 9, 2015

TAF-005-2, Process Information Form (PIF), Rev. 2, dated August 27, 2015

TRN-089, DOT Hazardous Material Employee Training package