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Attention: Catherine Haney  
Regional Administrator, Region II

LTR-RAC-16-63  
October 19, 2016

Subject: Confirmatory Action Letter – Columbia Fuel Fabrication Facility – Request for Restart  
Approval of S-1030 Scrubber System and Conversion Process Equipment

References: (1) Letter from D. Precht, Westinghouse, to NRC Document Control Desk, LTR-RAC-16-49 (Aug. 9, 2016), Commitments to Address the Columbia Fuel Fabrication Facility Scrubber Event  
(2) Letter from C. Haney, NRC, to B. Phillips, Westinghouse, EA-16-173 (Aug. 11, 2016), Confirmatory Action Letter – Westinghouse Electric Company, Columbia Fuel Fabrication Facility

In accordance with References (1) and (2), Westinghouse Electric Company (“Westinghouse”) is submitting this letter to notify the Nuclear Regulatory Commission (“NRC”) of its readiness to restart the S-1030 scrubber system and conversion process equipment at the Columbia Fuel Fabrication Facility (“Columbia”), and to request permission to do the same. Specifically, Westinghouse has completed its restart commitments, items (1) through (4) of Reference (1). All identified restart activities have been completed. In those cases where compensatory measures are being used, they will remain in place until the required permanent corrective action(s) are completed.

The Recovery Manager presented a summary of restart activities to the Westinghouse Oversight Board on October 12, 2016. Questions raised by the Oversight Board have been answered to the Board’s satisfaction, and the Board concurs with the decision to seek NRC permission to restart the S-1030 scrubber system and conversion process equipment at Columbia.

The actions we have taken to implement our commitments in Reference (1) have identified many corrective actions for us to address both before and after restart of the plant. For example, as part of the completion of the restart items listed in Reference (1), Westinghouse has already strengthened the technical safety basis of our activities at Columbia and has begun the process of strengthening the nuclear safety culture at the plant, with a focus on ensuring that our improvements are sustainable. In particular, the efforts undertaken during the execution of our restart commitments significantly strengthened the criticality safety basis for the wet ventilation systems, including the effectiveness of management measures that ensure the availability and reliability of the Items Relied On For Safety (IROFS) associated with these systems.

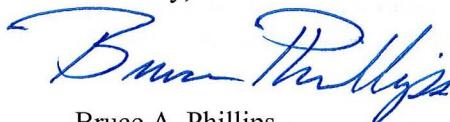
Our ongoing activities have identified additional post-restart recovery actions. These include expanding training programs on the plant's safety basis, improving the technical rigor and interface with criticality staff during configuration, design, and procedural changes, implementing corrective action program improvements, strengthening management measures and undertaking a broad-based effort to strengthen nuclear safety culture at Columbia. Other post-restart recovery actions include the following commitments:

1. Until all Westinghouse commitments confirmed in Reference (2) are completed, Westinghouse will verbally notify the NRC at least 14 calendar days prior to conducting any scheduled inspections for IROFS VENT-S1030-127, VENT-S1030-128, VENT-S1030-129, and VENT-S1030-137 per Westinghouse procedure COP-815021, *S-1030 Inspection and Clean-Out*;
2. Westinghouse will make available for NRC inspection the documented results of the scheduled inspections referenced above, as well as the inspection results for IROFS VENT-S1030-126 performed in accordance with the same procedure;
3. Westinghouse will make available for NRC inspection the validation results of the packing void fraction bounding assumption for the S-1030 Criticality Safety Evaluation; and
4. Westinghouse will make available for NRC inspection a technical justification for future changes to the inspection frequency for VENT-S1030-126, VENT-S1030-127, VENT-S1030-128, VENT-S1030-129, and VENT-S1030-137, prior to revising the frequency.

In addition to these four new commitments, Westinghouse remains committed to the post-restart activities, items (1) through (7) of Reference (1). Westinghouse will maintain a Recovery Manager and an Oversight Board in place until its recovery plan actions are complete. These activities are described in the Westinghouse post-restart recovery plan covering the comprehensive actions taken prior to restart and additional items identified to assure lasting improvement. Required post-restart actions are being tracked through the corrective action program.

Our top priority remains to protect the health and safety of the public and site personnel by continuing to implement our improvement actions in a deliberate and conservative manner. Should you have any questions, please contact me or Nancy Parr (803-647-3338, parrnb@westinghouse.com).

Sincerely,



Bruce A. Phillips  
Interim Vice President  
Columbia Fuels Operations  
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