



Westinghouse Electric Company LLC
Nuclear Fuel
5801 Bluff Road
Hopkins, South Carolina 29061-9121
USA

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Direct tel: 803-647-1858
Direct fax: 803-647-2025
e-mail: annacom@westinghouse.com

Your ref: 70-1151/2016-005
Our ref: LTR-RAC-17-13

February 24, 2017

Subject: Reply to a Notice of Violation
Reference: U.S. Nuclear Regulatory Commission Integrated Inspection Report No. 70-1151/2016-005 and Notice of Violation

Pursuant to the provisions of 10 CFR 2.201, Westinghouse Electric Company LLC (Westinghouse) herein provides a response to the NRC Integrated Inspection Report No. 70-1151/2016-005 and Notice of Violation, dated January 27, 2017. The inspection report addressed inspections of the Columbia Fuel Fabrication Facility (CFFF) conducted during the fourth quarter of calendar year 2016.

Appendix A provides a response to the Notice of Violation.

Should you have any questions or require additional information, please contact Nancy Parr of my Staff at (803) 647-3338.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mike Annacone', written over a horizontal line.

Mike Annacone, Vice President
Columbia Fuel Operations
Westinghouse Electric Company LLC
License SNM-1107 Docket 70-1151

cc: U. S. Nuclear Regulatory Commission
Regional Administrator, Region II
245 Peachtree Center Ave, NE Suite 1200
Atlanta, GA 30303-1257

APPENDIX A
WESTINGHOUSE RESPONSE TO NOTICE OF VIOLATION

NRC Inspection Report Number 70-1151/2016-005 identified a Severity Level IV Violation of NRC Requirements (Section 6.2 of the Enforcement Policy).

Violation: During an NRC inspection conducted November 14-17, 2016, a violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below:

Safety Condition S-1 of SNM License SNM-1107 states, in part, "For use in accordance with statements, representations, and conditions in the license application."

Chapter 3 of the Westinghouse Electric Company license application, Conduct of Operations, Section 3.4.1, Procedure Structure, states, in part, that "Operations to assure safe, compliant activities involving nuclear material are conducted in accordance with approved procedures."

Step 6 of Weekly OM-Inlet Transition, Elbow and Front of Basket Media Inspection in Work Order (WO) 747917 states "Remove LOTO [lockout/tagout] and restart nozzles."

Contrary to the above, on November 8, 2016, the licensee failed to remove LOTO and restart nozzles. Specifically, the licensee failed to reestablish process water flow to the spray nozzles for the front of the S-1030 scrubber packing section. The failure to reestablish process water flow resulted in a degradation of the ability of IROFS VENTS1030-105 to perform its intended safety function of preventing excess uranium accumulation for approximately 23 hours.

A.1

The following information is provided in response to Violation VIO 70-1151/2016-005-01 for failure to reestablish process water flow to the spray nozzles for the front of the S-1030 packing section.

A.1.a ACKNOWLEDGEMENT OF THE VIOLATION

The violation is correct as stated in the Notice of Violation. The valve going to the top scrubber recirculation spray nozzles was open as expected per the procedure, but the two valves going to the front scrubber recirculation spray nozzles were found in the closed position.

A.1.b REASON FOR THE VIOLATION

Based on the results of the apparent cause analysis, the reason for the violation is inadequate programmatic controls to ensure and maintain reliability and functionality of Items Relied On for Safety (IROFS) during maintenance and component restoration practices.

A.1.c CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

The closed valves were discovered by the Conversion supervisor approximately 23 hours after completion of the weekly inspection while he was performing the daily process water check, IROFS-VENT1030-105.

Upon discovery, water flow was re-established, management notifications were made, and the full weekly inspection was promptly re-performed to assure there had been no material accumulation. A courtesy call was made to inform NRC Region II of the issue and immediate actions taken. Corrective Action #100428685 was entered, and an apparent cause analysis was completed to evaluate the cause(s) and extent of condition.

The weekly inspection procedure was re-written to incorporate human error reduction techniques such as requiring sign off after performing each work step, assuring only a single action is specified in each work step, and adding verification signatures for critical steps to assure proper positioning of components associated with IROFS. Lastly, Operating Experience (OE) was shared with all departments at the CFFF. The inspection has been successfully completed for the past 13 weeks since implementation of the procedure quality improvements on November 15, 2016.

A.1.d ACTIONS TO PREVENT RECURRENCE

The completed actions described above in Section A.1.c are expected to prevent recurrence of the violation for failure to re-establish process water flow to the spray nozzles for the front of the S-1030 scrubber packing section.

Further actions to develop and implement improved plant standards for writing maintenance procedures, including how to identify IROFS and assure they are restored to the proper state upon completion of a maintenance task, are being tracked to completion in the corrective action program.

A.1.e DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on November 9, 2016 when the weekly inspection was re-performed.