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

January 19, 2018

Mr. Mike Annacone
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 INTEGRATED INSPECTION REPORT NO. 70-1151/2017-005

Dear Mr. Annacone:

This letter refers to the inspection conducted during the third quarter of calendar year 2017 (October 1 to December 31, 2017), at the Westinghouse Columbia Fuel Fabrication Facility in Hopkins, SC. The purpose of the inspection was to determine whether activities authorized under the license were conducted safely and in accordance with NRC requirements. The enclosed report presents the results of the inspection. At the conclusion of this inspection, the results were discussed with members of your staff at an exit meeting on November 30, 2017.

The inspection examined activities conducted under the license as they relate to the common defense and security, and to confirm compliance with the Commission's rules and regulations, and with the conditions of the license. Areas examined during the inspection are identified in the enclosed report. Within these areas, the inspection consisted of a selective examination of procedures and representative records, observations of activities, and interviews with personnel.

There were no violations of more than minor significance identified during the inspection.

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 contact Tom Vukovinsky of my staff at (404) 997-4622.

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 70-1151/2017-005
w/Supplemental Information

cc:
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SUBJECT: WESTINGHOUSE ELECTRIC COMPANY – NUCLEAR REGULATORY COMMISSION INTEGRATED INSPECTION REPORT NO. 70-1151/2017-005

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U. S. NUCLEAR REGULATORY COMMISSION
REGION II

Docket No.:	70-1151
License No.:	SNM-1107
Report No.:	70-1151/2017-005
Licensee:	Westinghouse Electric Company
Facility:	Columbia Fuel Fabrication Facility
Location:	Hopkins, SC 29061
Dates:	October 1 through December 30, 2017
Inspectors:	R. Gibson, Senior Fuel Facility Inspector T. Grice, Senior Fuel Facility Inspector G. Goff, Fuel Facility Inspector K. Womack, Fuel Facility Inspector
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 70-1151/2017-005
October 1 through December 30, 2017

The inspection was conducted by Nuclear Regulatory Commission (NRC) regional inspectors during normal shifts in the areas of radiological controls and facility support. The inspectors performed a selective examination of licensed activities that were accomplished by direct observation of safety-significant activities and equipment, tours of the facility, interviews and discussions with licensee personnel, and a review of facility records. No violations of more than minor significance were identified.

Radiological Controls

- In the area of Radiation Protection, no violations of more than minor significance were identified. (Paragraph A.1)

- In the area of Effluent Controls and Environmental Protection, no violations of more than minor significance were identified. (Paragraph A.2)

Facility Support

- In the area of the Transportation program, no violations of more than minor significance were identified. (Paragraph B.1)

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 (UF_6) 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 88030)

a. Inspection Scope

The inspectors performed Appendix 'B', "Exposure Controls and Dose Analyses," as described in Inspection Procedure 88030. This appendix is performed on a biannual basis and alternates with Appendix 'A', "Program, Monitoring, and Controls," of the same inspection procedure.

The inspectors reviewed the most recent quarterly and annual as-low-as-reasonably-achievable (ALARA) reports to determine if the licensee tracked short-term and long-term ALARA progress as required by the license application. The inspectors evaluated if the licensee used administrative and engineered controls, to the extent practical, to limit occupational doses per 10 Code of Federal Regulations (CFR) 20.1101(b). The inspectors noted the licensee conducted quarterly ALARA Committee meetings detailing ALARA goals and exposure summaries to identify undesirable trends. The inspectors reviewed meeting minutes to determine whether the ALARA Committee was reviewing facility operations in order to control radiation exposure in accordance with the license application. The inspectors interviewed the manager responsible for the ALARA evaluations and assessments and verified that activities were being implemented as required by the license application.

The inspectors reviewed the licensee's implementation of the process ventilation monitoring program to determine compliance with license requirements. The inspectors accompanied the licensee's Radiation Safety Engineer to identify gamma survey points on the ventilation ducting for the S-1030 Scrubber and the S-2A/2B systems, IROFS SSC-VENT-901. The inspectors verified that gamma surveys were conducted monthly and quarterly as required by procedure ROP-05-062, "Radiation Survey of Ventilation Equipment." The inspectors reviewed weekly records of the differential pressure readings across the demister pad to the S-1030 Scrubber, IROFS VENT-S1030-144, and the packed media section of the scrubber, IROFS VENT-S1030-136. The inspectors verified that the reading results were monitored in accordance with the requirements of procedure MCP-108104, "Roof Readings and Changing Roof-Top HEPA, Intermediate and Pre-Filters."

The inspectors accompanied a member of the radiation protection staff during a change out of air samples and observed air sampling equipment condition in radiologically controlled production areas. The inspectors also observed radiation protection staff perform radiological counts of air samples from fixed air samplers located throughout the facility. The inspectors verified that air samples were counted every eight hours during normal operations as required by procedure. The inspectors reviewed the licensee's air

sampling program for monitoring airborne 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 that was based upon an operator's duration in a specific airborne area, and the aerosol particle size assumed for the various uranium compounds processed on-site.

The inspectors reviewed the implementation of the respiratory protection program. The inspectors interviewed radiation protection technicians on the preparation and use of respirators in the plant and reviewed respiratory protection training and procedures. The inspectors verified that the licensee was performing medical evaluations of respirator users, fit testing, and user seal checks in accordance with 10 CFR 20.1703. The inspectors also verified that the respirators were tested and certified by the National Institute for Occupational Safety and Health (NIOSH). The inspectors observed the fit testing of an operator by a radiation protection technician and verified that the technician followed procedure ROP-01-050, "Operation of Quantifit Personnel Respirator Leak Rate Analyzer," for fit testing respirators. The inspectors examined a random sampling of respirators and cartridges for deterioration and defects and noted that the equipment was properly cleaned and in adequate condition.

The inspectors reviewed samples of personnel exposure data and verified that radiological exposures were maintained in accordance with ALARA principles 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)/year. In addition, the inspectors confirmed that the Lens Dose Equivalent and Shallow Dose Equivalent results were less than the regulatory limit of 15 rem/year and 50 rem/year, 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 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. The inspectors evaluated a sample of bioassay programmatic functions and internal exposure assessments to determine if the bioassay program was being implemented in accordance with the license application.

b. Conclusion

No violations of more than minor significance were identified.

2. Effluent Controls and Environmental Protection (Inspection Procedure 88045)

a. Inspection Scope

The inspectors evaluated a sample of environmental programmatic functions to determine if the licensee had implemented and maintained an environmental protection program in accordance with Chapter 10, Environmental Protection, of the license

application. The inspectors interviewed licensee staff on program and personnel changes to determine if significant changes within the last 12 months had been completed in accordance with license requirements.

The inspectors reviewed samples of documentation and procedures to determine if the environmental program's functions and responsibilities remained independent from operations in accordance with license requirements. The inspectors reviewed environmental related procedures that were revised since the last inspection to verify that revisions were in accordance with licensee requirements.

The inspectors also reviewed audit (EHS-AUDIT-17-19, "Supplier Audit of General Engineering Laboratories, LLC," dated October 20, 2017). The audit was performed by the licensee to evaluate the performance of General Laboratories, LLC. The audit was a requirement of 10.1.8 (Audits and Assessments) of the license application. The inspector verified that audit findings were captured in the licensee's corrective action program (CAP) in accordance with Chapter 3.6 (Audits and Assessments) of the license application.

The inspectors reviewed the second-half of calendar year 2016 and first-half of calendar year 2017 semi-annual discharge reports to determine if the licensee was in compliance with 10 CFR 70.59. The inspectors reviewed the public dose assessment, based on these two semi-annual discharge reports, and noted that the total dose to the hypothetical public individual likely to receive the highest dose from licensed operations did not exceed the 10 CFR 20.1301(a)(1) limit. The inspectors reviewed the airborne portion of the public dose assessment provided in the quarterly ALARA reports to verify that the result was in compliance with the ALARA constraint required by 10 CFR 20.1101(d). The inspectors also reviewed documentation (CAS-004-1, "Records Flow Schedule," Revision (Rev.) 2, dated July 14, 2016) to verify that the licensee was in compliance with retention requirements stated within 10 CFR 20.2107.

The inspectors reviewed records of airborne emissions for the previous year to verify if the emissions were in compliance with 10 CFR 20.1302. The inspectors observed air filter collections for stacks and off-site ambient air monitors to verify that licensee actions were in compliance with procedures. The inspectors verified that air monitoring equipment was calibrated and functioned as per 10 CFR 20.1501 and the applicable procedure (ROP-01-028, Calibration Verification of Flowmeters, Rev. 12, dated June 22, 2017).

The inspectors verified that all ambient environmental monitoring stations were fully operational and capable of providing accurate sampling performance in compliance with Chapter 10.1.4 of the license application. The inspectors also reviewed recent records of vegetation, soil, sediment, and groundwater radiological monitoring to evaluate licensee compliance with Chapter 10.4.1 of the license application.

The inspectors reviewed a sample of liquid effluent discharge records to verify that all results were below ALARA limits. Inspectors observed on-site liquid sample collections to verify that licensee actions were in compliance with licensee procedures. The inspectors also reviewed recent on-site sanitary treatment system discharge results from reports to determine if the results were below 10 CFR 20.2003 limits.

The inspectors reviewed samples of corrective actions related to the environmental program that were entered into the licensee's CAP since November 2016, to determine if the licensee was entering issues and correcting them in accordance with license requirements.

b. Conclusion

No violations of more than minor significance were identified.

B. Facility Support

1. Transportation (Inspection Procedure 86740)

a. Inspection Scope

The inspectors evaluated samples of transportation documentation and licensee procedures to determine whether the licensee had established and maintained an effective program to ensure radiological and nuclear safety during the receipt, packaging, delivery, and private carriage of licensed radioactive materials were in compliance with regulatory requirements and license conditions.

The inspectors reviewed a number of records involving the shipment and receipt of special nuclear material to verify that the appropriate documentation accompanied shipped and received packages, including specific driver instructions, emergency information, and radioactive material information. The inspectors also observed the loading of packages onto trailers and inspected other packages staged for shipment to verify that the required information was marked on each package, including the transportation index, criticality safety index, and labeling.

The inspectors reviewed training records to ensure that the licensee had administered 49 CFR 172.704 hazardous materials transportation training to affected personnel as required by the Department of Transportation. The inspectors observed two operators implement recently revised procedures involving the unloading of radioactive material from a received shipment and noted that written management-approved instructions have been established to carry out transportation activities and that changes to the program were effectively communicated to operators.

b. Conclusion

No violations of more than minor significance were identified.

C. Special Topics

1. Event Follow-up

EN 53026: 70.50(b)(1) – Unplanned Contamination.

a. Inspection Scope

The inspectors reviewed the apparent cause report associated with the contamination of a worker while performing offloading operations on a LR-230 uranyl nitrate container.

The purpose of the inspection was to determine if licensee responses were in accordance with the licensee's corrective action program. The inspectors reviewed previous and current revisions of the container offloading procedure, and interviewed the contaminated individual and other affected personnel to verify that revisions to procedures had been clearly communicated to workers. The inspectors directly observed container offloading operations to verify that configuration changes were in place.

Safety Condition S-1 of License SNM-1097 authorizes the licensee to operate in accordance with conditions in the license application. Section 3.4 of the license application states, in part, that operations are conducted in accordance with procedures.

Contrary to the above, on October 18, 2017, the licensee failed to follow procedure COP-836047 when a pressurized air hose was connected to an LR-230 container prior to the fluid collection hose being in place. Before the fluid collection hose could be connected, the valve controlling the flow of pressurized air was inadvertently actuated and approximately 6 to 8 gallons of low enriched uranyl nitrate were spilled on the operator and LR-230 container.

The licensee took appropriate immediate corrective actions to decontaminate the operator and offloading area. The operator received no significant chemical or radiological dose. The licensee also implemented long term corrective actions by revising the procedure to use an air hose valve located away from the outlet connection, changing the handle on the air hose valve, and adding additional personal protective equipment for operators, as described in CAPAL 100498147. The event and corrected nonconformance is being treated as a minor violation, consistent with Appendix B of NRC Inspection Manual Chapter 0616, that is not subject to enforcement action in accordance with the NRC Enforcement Policy. This minor violation is considered closed.

b. Conclusion

A minor violation of NRC requirements was identified. Event Notification 53026 is considered closed.

D. 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 30, 2017 to J. Howell and staff. No dissenting comments were received from the licensee. Proprietary information was discussed but not included in the report.

SUPPLEMENTAL INFORMATION

1. KEY POINTS OF CONTACT

Name	Title
G. Blackstone	Health Physics Technician
P. Bartman	QA Manager
G. Byrd	Licensing Engineer
T. Carver	Lead Project Analyst
J. Coleman	Measurement Control Coordinator
R. Crews	Health Physics Technician
J. Howell	Environmental, Health and Safety (EH&S) Manager
C. Hopkins	US Transportation Operations Manager
B. Huff	Health Physics Technician
D. Joyner	Principal Environmental Engineer
C. Logsdon	Principal Environmental Engineer
J. Maddocks	Health Physics Technician
N. Parr	Licensing Manager
K. Ringbloom	Health Physics Technician
D. Wagoner	Radiation Safety Engineer

2. LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Closed

70-1151/2017-005-01	VIO	Minor violation for the failure to follow the procedure during uranyl nitrate offloading.

3. INSPECTION PROCEDURES USED

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

4. DOCUMENTS REVIEWED

Records:
Apparent Cause Analysis Report, URRS Safety LC Reset – UN Spill LR230 Offload, LTR-LCPT-17-11, Submittal of 71.10(b) Report, dated August 28, 2017
TR-001, U.S. Transport Operations Charter, Rev. 6, dated December 19, 2013
TR-200, Shipment of Nuclear Reactor Fuel Rods / Assemblies, Rev. 18, dated November 15, 2012
COP-836047, Uranyl Nitrate Offloading from LR-230 Containers, Rev. 14, dated September 21, 2017
COP-836047, Uranyl Nitrate Offloading from LR-230 Containers, Rev. 14, dated October 31, 2017
QA-600, Westinghouse Global Management System / QA Program Implementation, Rev. 14, dated September 14, 2017
Annual ALARA Committee Meeting Minutes

CY 2017 1st Quarter ALARA Report
CY 2017 2nd Quarter ALARA Report
EH&S Health Physics Operations Manager Training Checklist
EH&S HP Technician Radiation Protection Training Checklist
WEC-17-165, Internal Assessment Report, Rev. 0
QA-600-3, Quality Assurance Program for Packaging Used in the Transport of Radioactive Material List of Implementing Procedures, Rev. 6, dated September 22, 2012
QMS-A, Westinghouse Electric Company Quality Management System, Rev. 7, dated October 1, 2013
RA-106, EH&S Audits at the Columbia Fuel Fabrication Facility, Rev. 34, dated November 16, 2017
W2-4.2-101, Internal Quality Assurance Audits, Rev. 3, dated July 18, 2017
WEC-13-03, Nuclear Fuel Part 71 Transport, dated March 2013
CAS-004-1, Records Flow Schedule, Revision 2, 07/14/2016 (records retention)
Congaree River and Fish Analyses, October 2016 through September 2017
EHS-AUDIT-16-19, Environment Health & Safety Audit for the Storm Water Permit, dated December 16, 2016
EHS-AUDIT-17-5, Environment Health & Safety Audit for the Storm Water Permit, dated March 30, 2017
EHS-AUDIT-17-11, Comprehensive Storm Water Permit Audit Report, dated June 30, 2017
EHS-AUDIT-17-18, Environment Health & Safety Audit for the Storm Water Permit, dated September 29, 2017
EHS-AUDIT-17-19, Supplier Audit of General Engineering Laboratories, LLC, dated October 20, 2017
Environmental TLD Reports for 2016
Environmental TLD Reports for 2017 (latest available)
LTR-EHS-17-70, CY 2017 2nd Quarter ALARA Report, dated October 4, 2017
LTR-EHS-64, Master List of Items for the EH&S Quality Policy Manual, dated October 6, 2017
LTR-EHS-79, Master List of Items for the EH&S Quality Policy Manual, dated November 29, 2017
LTR-RAC-17-14, NRC Semi-Annual Discharge Report, July–December 2016, dated March 1, 2017
LTR-RAC-17-38, NRC Semi-Annual Discharge Report, January–June 2016, dated September 8, 2017
LTR-RAC-17-46, NPDES Permit #SC0001848 Ground Water Sampling, October 2015 through July 2016, Annual Report, dated October 7, 2016
LTR-RAC-17-46, NPDES Permit #SC0001848 Ground Water Sampling, October 2016 through July 2017, Annual Report, 09/28/2017
LTR-RAC-17-54, #EN53026, 30 Day Follow-Up Report, dated November 17, 2017
Soil and Vegetation Analysis, October 2016 and May 2017

Procedures:
MCP-108104, Roof Readings and Changing Roof-Top HEPA, Intermediate and Pre-filters, Rev. 34, dated November 3, 2016
SYP-218, Respiratory Protection, Rev. 12, dated March 3, 2016
RA-120-16, Regulatory Policy – ALARA Committee, Rev. 2, dated November 2, 2017
RA-204, Bioassay Program, Rev. 14, dated March 20, 2008
RA-206, Personnel Dosimetry Program, Rev. 16, dated June 13, 2013

RA-218, Personnel Exposure & Respirator Usage Log Instructions, Rev. 5, dated March 23, 006
RA-219, ALARA Program, Rev. 4, dated October 26, 2017
RA-222, Routine In vivo Count Program, Rev. 11, dated December 6, 2007
RA-225, Control of Radiation Dose and Chemical Exposure to the Embryo/Fetus, Rev. 2, dated May 11, 2006
RA-227, Airborne Radioactivity Monitoring and Control, Rev. 3, dated August 31, 2006
ROP-01-028, Calibration Verification of Flowmeters, Rev. 12, dated June 22, 2017
ROP-01-039, Air Sample Systems Integrity Verification, Rev. 5, dated September 29, 2011
ROP-01-050, Operation of the Quantifit Personnel Respirator Leak Rate Analyzer, Rev. 15, dated May 30, 2013
ROP-02-012, Washing Respiratory Protection Equipment, Rev. 15, dated November 9, 2017
ROP-03-001, Personnel Dosimetry System, Rev. 22, dated July 30, 2015
ROP-04-007, Performing In vivo Counts, Rev. 13, dated April 7, 2016
ROP-04-012, Processing, Packaging and Shipping Bioassay Samples, Rev. 1, dated March 24, 2016
ROP-05-001, Preparation, Analysis and Processing of In-plant Air Samples, Rev. 17, dated July 27, 2017
ROP-05-062, Radiation Survey of Ventilation Equipment, Rev. 19, dated April 27, 2017
ROP-05-069, Quarterly Air Sampling of In-plant Recirculating Ventilation Systems, Rev. 11, dated June 29, 2017
ROP-05-070, Air Sampling Representativeness, Rev. 7, dated December 20, 2012
ROP-05-014, Performing Contamination Surveys of the Westinghouse Facility, Rev. 32, dated April 13, 2017
ROP-06-002, Roof Effluent Air Sampling and Counting, Rev. 24, dated March 19, 2015
CA-007, Corrective and Preventive Action, Rev. 39, dated August 7, 2017
RA-401, Environmental Control Requirements Mandated by 10CFR20 Regulations and NRC License SNM-1107, Rev. 20, dated August 20, 2015
RA-406, Sampling Congaree River Water, Fish and Sediment, Rev. 9, dated December 29, 2016
ROP-01-026, TENNELEC Background and Efficiency Operations, Rev. 17, dated June 29, 2017
ROP-01-028, Calibration Verification of Flowmeters, Rev. 12, dated June 22, 2017
ROP-01-041, iMatic Background and Efficiency Operations, Rev. 1, dated May 8, 2014
ROP-05-004, Determining Gross Alpha & Beta Activity of an Aqueous Sample, Rev. 18, dated May 28, 2015
ROP-06-001, NPDES Daily, Weekly, and Monthly Effluent Sample Collection, Rev. 44, dated May 10, 2017
ROP-06-003, Ambient Environmental Air Monitoring for Radioactivity, Rev. 12, dated January 13, 2011
ROP-06-004, Determining of Gaseous Fluoride Using Calcium Oxide Papers, Rev. 5 dated February 2, 2012
ROP-06-006, Collection of Routine Weekly and Monthly Environmental Samples, Rev. 26, dated June 8, 2017

Other Documents:
Westinghouse Reported Event #EN53026 30 Day Follow-Up Report
100498147, Apparent Cause Analysis Report, URRS Safety LC Reset - UN Spill LR230 Offload, (no date)
EHS Organizational Chart

RA-108-4, General-Entire Chemical Area Safety Significant Control Sketch, Rev. 46, dated October 19, 2017
RA-120-08, Application of Quality Assurance (QA) Program Criteria, Rev. 4, dated May 1, 2014
RAF-132-1, Safety Analysis/ISA Implementation Checklist, Rev. 4, June 2, 2016 (specifically for ISA 103, Rev. 12, dated February 17, 2017)
RAF-219-1, ALARA Goals (sketch), Rev. 14, dated May 25, 2017
Miscellaneous staff training records
Miscellaneous shipping records

Condition Reports:
CAPAL 100504418, "Update Sketch QA-600-3"
CAPAL 100504419, "10CFR71 Audit Schedule"
CAPAL 100504469, "Prepardedness for NRC Transport Inspection"
CAPAL 100504470, "Transport Training Qualifications"
CAPAL 100504471, "US Transport Operations Charter needs to be updated"
Other: #100416419, 100420459, 100430251, 100433939, 100463038, 100498147, 100451849, 100498537, 100498538

Condition Report Reviewed:
CAPAL 100498147, "URRS Safety LC Reset – UN Spill LR230 Offload"