

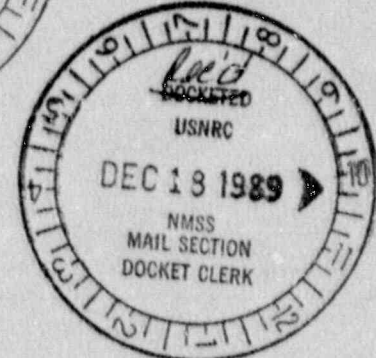
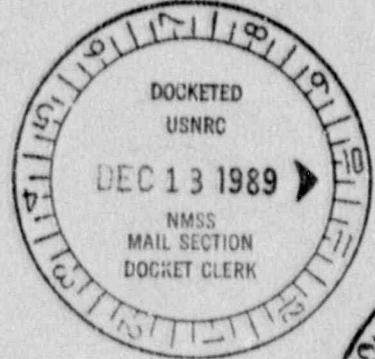
RETURN TO <sup>P1-37</sup> 396-SS

70-1100

**COMBUSTION ENGINEERING**

December 13, 1989  
LD-89-140

Docket No. 70-1100  
License No. SNM-1067



Mr. Leland C. Rouse, Chief  
Fuel Cycle Safety Branch  
Division of Industrial and  
Medical Nuclear Safety  
Office of Nuclear Materials  
Safety and Safeguards  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Subject: Revision to Organization Amendment

Reference: Letter LD-89-138, A. E. Scherer (CE) to L. C. Rouse (NRC),  
dated December 11, 1989

Dear Mr. Rouse:

This letter transmits minor changes to our Amendment Request of  
December 11, 1989 (Reference). These changes are a result of  
suggestions made by Nuclear Materials Safety and Safeguards staff on  
October 12, 1989. Forwarded herewith are Enclosure I, containing a  
list of the affected pages and Enclosure II, the proposed replacement  
pages. Six (6) copies of Enclosures I and II are included for your  
use.

Since the meeting identified no substantial difficulty with our  
proposed Amendment, we have made the changes immediately  
effective.

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(203) 688-1911  
Telex: 99297

9001160327 891213  
PDR ADOCK 07001100  
C PDC

*add info 2/81*

*DFB3*

Leland C. Rouse  
December 13, 1989

LD-89-140  
Page 2

If I can be of any assistance in this matter, please do not hesitate to call me or Mr. J. F. Conant of my staff at (203) 285-5002.

Very truly yours,

COMBUSTION ENGINEERING, INC.



A. E. Scherer  
Director  
Nuclear Licensing

AES:jeb

Enclosures: As Stated

cc: J. Roth (NRC - Region I)

COMBUSTIGN ENGINEERING, INC.  
WINDSOR NUCLEAR FUEL MANUFACTURING FACILITY  
REVISION TO REQUEST FOR LICENSE AMENDMENT  
LIST OF AFFECTED PAGES

DECEMBER 13, 1989



Docket No. 70-1100  
License No. SNM-1067

WINDSOR FUEL MANUFACTURING FACILITY  
REQUEST FOR LICENSE AMENDMENT

Combustion Engineering requests that the application for license (SNM-1067) for the Windsor Fuel Manufacturing Facility be amended to reflect changes which have been made to the organization structure. Changes are denoted by a bar in the right hand margin of each affected page. The changes provided herein revise selected pages from our Amendment Request dated December 11, 1989 and are being submitted in response to NRC staff comments.

<u>Deleted Pages</u>			<u>Added Pages</u>		
<u>Page No.</u>	<u>Date</u>	<u>Rev.</u>	<u>Page No.</u>	<u>Date</u>	<u>Rev.</u>
I.2-6	12/11/89	07	I.2-6	12/13/89	07
I.2-8	12/11/89	07	I.2-8	12/13/89	07
I.2-9	12/11/89	06	I-2.9	12/13/89	06
II.3-4	12/11/89	05	II.3-4	12/13/89	05

Enclosure II to  
LD-89-140

COMBUSTION ENGINEERING, INC.

WINDSOR NUCLEAR FUEL MANUFACTURING FACILITY

REVISION TO REQUEST FOR LICENSE AMENDMENT

REVISED PAGES

DECEMBER 13, 1989

### 2.1.13 Emergency Director

The Emergency Director reports to the Plant Manager. In this capacity he or she coordinates the actions of the emergency response team members (for both on- and off-site support). The Emergency Director shall remain in control of emergency operations until the situation is stabilized or terminated depending on the severity of the incident. The Emergency Director has authority to direct recovery operations for any emergency condition which may arise in the Nuclear Fuel Manufacturing facility or Product Development laboratories. The Emergency Director may designate qualified alternates.

## 2.2 Personnel Education and Experience Requirements for Key Positions Important to Safety

### 2.2.1 Plant Manager

The minimum qualifications for this position are a bachelor's degree in one of the sciences or engineering, with ten (10) years experience, including at least five (5) years in management positions in the nuclear industry.

### 2.2.2 Director, Product Development

The minimum qualifications for this position are a bachelor's degree in one of the sciences or engineering, with ten (10) years experience, including at least five (5) years in management positions relating to product development activities in the nuclear industry.

### 2.2.3 Program Manager, Radiological and Industrial Safety

The minimum qualifications for this position are a bachelor's degree in one of the sciences or engineering, with four (4) years experience in health physics, including two (2) years in operational health physics with uranium bioassay techniques, internal exposure controls and radiation measurement techniques.

### 2.2.4 Senior Criticality Specialist

The minimum qualifications for this position shall be a bachelor's degree in one of the sciences or engineering, with two (2) years experience performing the duties of a Nuclear Criticality Specialist.



2.2.10 Radiological Protection and Industrial Safety Technicians

The minimum qualifications for this position are a high school diploma with one (1) year of experience in at least one of the safety related areas within his or her cognizance. Technicians shall also complete a facility specific training program(s) in safety related areas within their area(s) of cognizance.

2.2.11 Manager, Production

The minimum qualifications for this position are a high school diploma with five (5) years experience in the nuclear industry. At least three (3) years of experience shall be in production coordination positions.

2.2.12 Manager, Manufacturing Engineering

The minimum qualifications for this position are a bachelor's degree in one of the sciences or engineering, with three (3) years experience in the nuclear industry.

2.2.13 Emergency Director

The Emergency Director shall be a member of the Nuclear Fuel management team and shall be familiar with the Nuclear Fuel Manufacturing and Product Development processes and facilities. He or she shall be familiar with the emergency plan and the implementing procedures for the Nuclear Fuel Manufacturing facility and Product Development laboratories.

Alternate Emergency Director designees shall be selected from the Nuclear Fuel Manufacturing or Product Development supervisory levels or above. Alternates shall also be familiar with the emergency plan and the implementing procedures for the Nuclear Fuel Manufacturing facility and Product Development laboratories.

2.3 Facility Review Group

The Nuclear Fuel Manufacturing facility and Product Development laboratory operations are monitored by a Facility Review Group. The Facility Review Group reports to the Plant Manager and is responsible for oversight of safety related operations.

The Facility Review Group is composed of senior personnel from the technical staff of Combustion Engineering's Nuclear Power Businesses organization that have at least five (5) years experience in the nuclear industry. The overall function of the Facility Review Group is to review operations on a regular basis. In order to execute this responsibility, the Group will meet at least quarterly to review operations and more often if deemed necessary by the Chairperson.

As a minimum, the Group shall perform the following specific functions:

- Review environmental protection practices and trends.
- Review radiological safety practices and trends.
- Review criticality safety practices and trends.
- Review industrial safety practices and trends.
- Review the adequacy of emergency planning tests and drills.
- Review effectiveness of the ALARA program.
- Review internal inspection and audit reports.
- Review abnormal occurrences and accidents, including recommendations to prevent recurrence.
- Review physical facility changes in the Pellet Shop and changes to operations involving radiation and/or nuclear criticality safety.

The Chairperson of the Facility Review Group, the Plant Manager or the Vice President, Nuclear Fuel may request the Group to examine other areas deemed appropriate.

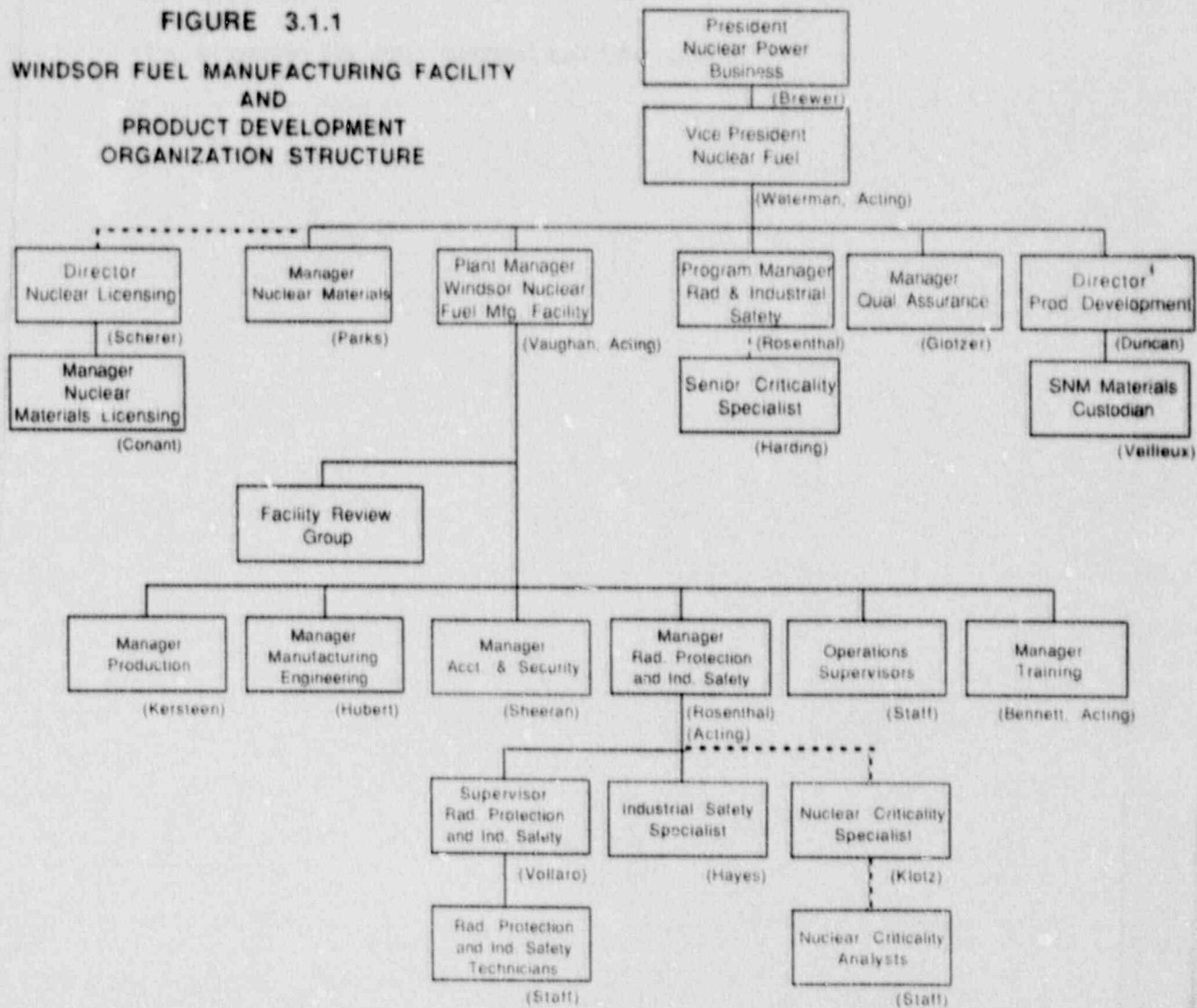
The Group may establish subcommittees and/or use consultants, as necessary, to carry out its various responsibilities. Findings, however, shall be those of the Group and not just that of the subcommittees or consultants. If there are dissenting opinions, they shall be incorporated in the Group report. It is the responsibility of the Line Managers in the fuel manufacturing facility and the Director of Product Development to ensure that deficiencies identified by the Group, in their area of cognizance, are addressed.

As a minimum, the Group shall also prepare a quarterly report summarizing the facility operations with emphasis on compliance with the various safety programs and standards which form the basis for the detailed facility operating procedures and safety limits. The reports shall also address the effectiveness of the ALARA program.

Findings and recommendations (if any) of the Group shall be reported to the Plant Manager and the



**FIGURE 3.1.1**  
**WINDSOR FUEL MANUFACTURING FACILITY**  
**AND**  
**PRODUCT DEVELOPMENT**  
**ORGANIZATION STRUCTURE**



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CONTROL NO. 26181  
DATE OF DOC. Dec. 13, 1989  
DATE RCVD. Dec. 18, 1989  
FCUF  PDR   
FCAF \_\_\_\_\_ LPDR \_\_\_\_\_  
I & E REF.   
SAFEGUARDS   
FCTC \_\_\_\_\_ OTHER \_\_\_\_\_  
DATE 12/18/89 INITIAL SME