



Westinghouse
Electric Corporation

Nuclear Fuel Division
Manufacturing Department

Drawer R
Columbia South Carolina 29250
(803) 776-2510

September 28, 1981

U. S. Nuclear Regulatory Commission
101 Marietta Street, Suite 3100,
Atlanta, Georgia 30303

ATTENTION: Mr. J. P. O'Reilly, Director
Region II

RE: NRC Report No. 70-1151/81-11

Gentlemen:

In response to your letter of September 3, 1981, concerning an I & E inspection of our facilities conducted on August 10-14, 1981, and pursuant to the provisions of Section 2.201 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, Westinghouse comments are transmitted herewith as Appendices A through D.

If you should have any questions regarding this matter, please write to Mr. E. K. Reitler or me at the above address, or telephone either of us at (803) 776-2610.

I hereby confirm that the statements made in this response are true and correct to the best of my knowledge and belief.

Sincerely,

WESTINGHOUSE ELECTRIC CORPORATION

Mead D'Amore, Manager
Manufacturing and Columbia Plant

MD/ff
WP #0283E:3

Attachments (4)

8111050416 811026
PDR ADOCK 07001151
C PDR

APPENDIX A

WESTINGHOUSE RESPONSE TO NRC NOTICE OF VIOLATION 81-11-02

In regard to the requirement that individual workers survey themselves for contamination when exiting the Controlled Area, the following actions are identified:

1. The violation is correct as stated in your notice of violation report.
2. The violation resulted from a failure of several individuals to adhere to management-approved survey procedures and instructions and a failure of management to provide routine audits of employee performance in this area.
3. Area supervision was immediately notified of the problem and was requested to immediately inform their employees of the importance and necessity of following plant procedures. Furthermore, management reemphasized contamination control requirements to all employees in Workplace Meetings which were prepared specifically for this purpose. In addition, personnel contamination survey instructions were clarified and reposted at each stepoff pad to serve as a continual reminder of proper survey techniques. Management audits of personnel exiting the Controlled Area have verified that the above actions have been effective in achieving compliance.
4. Area supervision has been instructed to provide routine audits of personnel exiting the Controlled Area, particularly during shift changes.
5. The management actions and administrative controls described above have been completed and are in effect. Full compliance is expected from all employees.

APPENDIX B

WESTINGHOUSE RESPONSE TO NRC NOTICE OF VIOLATION 81-11-01

In regard to operability of contamination control survey instruments, the following actions are identified:

1. The violation is correct as stated in your notice of violation report except for Item B.1. The facility housekeeping daily check sheet did contain the required operational or functional checks on survey instruments. This was confirmed in a September 15, 1981, telephone call from your Mr. Puckett to Mr. C. F. Sanders of Westinghouse.
2. The violation resulted from a failure to perform routine instrument checks in accordance with a check sheet and a failure to provide a formal procedure for this function.
3. To correct this oversight, Regulatory Compliance issued instructions for personnel to immediately reinstitute daily instrument operability checks. A procedure was subsequently written to formalize this requirement. These actions have been effective in minimizing instrument downtime.

Based upon an evaluation of the contamination control program, the following actions have been implemented: (a) Additional instruments have been installed for personnel frisking at certain high traffic exit points from the Controlled Area to assure that there is a working instrument in the event that one should become inoperative, (b) The number of exit points from the Controlled Area has been reduced to improve surveillance and maintenance of these areas.

4. Routine audits of instrument operability checks have been established to prevent recurrence.
5. Full compliance has been achieved.

APPENDIX C

WESTINGHOUSE RESPONSE TO NRC NOTICE OF VIOLATION 81-11-03

In regard to failure to initiate immediate decontamination or area isolation, the following actions are identified:

1. The violation is correct as stated in your notice of violation report.
2. The failure to take immediate action to decontaminate the area resulted from a misunderstanding between the management representative and the Health Physics Technician as to which individual was to initiate the request for decontamination following this special survey. In accordance with existing procedures, action requests are initiated by Health Physics Technicians following routine surveillance. All Regulatory Compliance personnel were reformed that license action requirements apply to both routine and special surveys.
3. As indicated above, Regulatory Compliance personnel were reformed that license action requirements apply to both routine and special surveys. Subsequent survey results and necessary actions have been in compliance with license conditions.
4. The above actions have been successful in preventing recurrence.
5. Full compliance has been achieved.

APPENDIX D

WESTINGHOUSE RESPONSE TO NRC NOTICE OF VIOLATION 81-11-04

In regard to fixed contamination surveys, the following actions are identified:

1. The violation is correct as stated in your notice of violation report.
2. The failure to perform routine fixed surveys resulted from a procedural deficiency which failed to adequately differentiate between fixed and removable surveys.
3. All Health Physics Technicians were verbally instructed to perform both fixed and removable surveys on August 12, 1981. Furthermore, the contamination surveillance procedure was modified on August 21, 1981, to clarify this requirement and further define responsibilities for surveillance, decontamination and auditing of the contamination surveillance program. Subsequent surveys have been performed in compliance with license conditions.
4. The above actions have been successful in preventing recurrence.
5. Full compliance has been achieved.