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For Mr. Price

Westinghouse

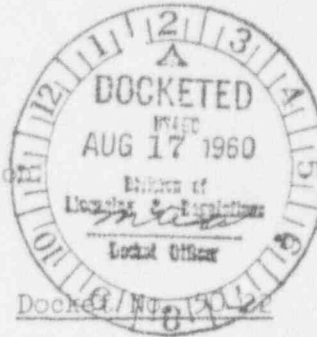
ELECTRIC CORPORATION



TESTING REACTOR
August 15, 1960

P.O. BOX 1075
PITTSBURGH 30, PA.

Mr. Harold L. Price, Director
Division of Licensing and Regulation
Atomic Energy Commission
Washington, D.C.



Dear Sir:

Re: Docket No. 1075

This letter is a report in further compliance with the order issued by you on June 30, 1960 in the above-captioned proceeding.

As required by the order, Westinghouse analyzed the incident and made a report to the Commission (WTR-49) dated July 7, 1960. In addition, Westinghouse has carefully reviewed (a) the administrative procedures covering the operation of the facility and experiments therein; and (b) the methods to assure the compatibility of those procedures with the terms and conditions of License Number TR-2. As a result of that review, Westinghouse has decided to make certain revisions in those procedures. Those procedural revisions will be adopted immediately.

In order to make an explanation of these procedural revisions meaningful, they must be understood within the context of the overall administrative procedures applicable to running the facility. The discussion which follows places them within that framework.

As would be expected in the case of a testing reactor, the administrative procedures for the operation of the facility and the conduct of experiments therein vary according to the type of situation involved. Situations fall into three categories:

- A. Experiments requested by other divisions of Westinghouse or by outside customers (called "outside" experiments)

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B. Experiments initiated by the facility staff (called "inside" experiments)

C. Changes in the facility

In addition there are certain procedures applicable to the normal operation of the facility when it is unnecessary to invoke any procedures peculiar to the particular nature of the changes or experiments referred to above. In general, the Scientific Support staff of the facility determines the technical requirements and engineering specifications for the change or experiment involved and the Technical Operations staff translates these requirements and specifications into operational terms and actually carries out the experiments or changes.

A. "Outside" Experiments

All these experiments, as required by the license, are reviewed by the Safeguards Committee although allowance is made for analysis of particular details of the experiments by a subcommittee which reports to the Committee.

If the conduct of the experiment will involve a change in the facility (a matter to be determined by the Safeguards Committee), the procedures set forth in Category C below will apply.

Procedural revisions: If any special operating procedures must be written (unlikely when the facility is being operated in steady state with a number of experiments in the reactor), such procedures will be approved by a three-man subcommittee of the Safeguards Committee.

B. "Inside Experiments"

In this situation the requirements and specifications for the experiment are reviewed by the Safeguards Committee and any special operating procedures are reviewed by a subcommittee.

Procedural revisions: All tests specifications will be translated into special operating procedures and those procedures will be reviewed by at least a three-man subcommittee of the Safeguards

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Committee. Before an experiment is begun and during its course, the reactor operator will record in the log book any special operating procedures under which the experiment is to be conducted.

C. Changes in the Facility

After preparation of specifications and requirements, a subcommittee of the Safeguards Committee evaluates the requirements and specifications to determine the nature of the change.

If the subcommittee decides that the change is one which falls under paragraph 3a(4) of the license, the matter is referred to the Safeguards Committee for review and determination and thereafter is processed in accordance with the requirements of the cited paragraph of the license.

If the subcommittee concludes that the change falls within paragraph 3a(5) of the license, it then determines the nature of the change. If determined to be "minor" (i.e., as involving hazards significantly less and not different from those analyzed in the Final Safety Report and as not involving a material alteration of the facility), no further review is made but a copy of the engineering change notice is filed with the Safeguards Committee.

If the subcommittee determines that the hazards involved in the change are "intermediate" (i.e., are or may be as great as but not different from those analyzed in the Final Safety Report, and do not involve a material alteration of the facility), the proposed change to the facility proceeds but the entire matter is further reviewed by the Safeguards Committee (at its next meeting).

If the subcommittee determines that the hazards involved in the change are "major" (i.e., are or may be greater than or different from those analyzed in the Final Safety Report and/or may or do involve a material alteration of the facility), no action is taken until the Safeguards Committee has approved the change.

Procedural revisions: Hereafter, the initial determination of the license path to be followed will be made by the Manager of the Scientific Support staff who also is a member of the Safeguards Committee. However, a prior review will be made by a three-man

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subcommittee of the Safeguards Committee, before the change is made, when the change has been determined to be an intermediate change, and the Committee itself will review the change after the fact.

The procedures as to safety review under this heading apply only to the extent that they do not duplicate other procedures for safety review specifically required under Categories A and B above.

Procedures Generally Applicable

These procedures include (1) detailed procedures for the operation of the reactor and associated systems under normal operating conditions (called "standard operating procedures"); (2) general standards from which are evolved procedures for the operation of the reactor and associated systems under normal operating conditions (called "standards"); and (3) provisional additions to or variations in procedures for the operation of the facility under normal operating conditions (called "standing orders").

The term "normal operating conditions" indicates that the method of operating the facility is not otherwise governed by conditions applicable to Categories A, B or C.

Procedural revisions: Hereafter, all standard operating procedures will be reviewed in advance by the Safeguards Committee before they are made effective. Standards will be initially reviewed by a subcommittee of the Safeguards Committee and will not in any case be made applicable to the operation of the facility without a review by a three-man subcommittee of the Safeguards Committee. Provisional additions to or variations in procedures will hereafter be limited in use to non-reactor systems.

Communication of Procedures

As to administrative procedures applicable to the operation (as distinguished from management) of the facility, Westinghouse will continue to follow its past practice of communicating such procedures in writing to the appropriate shift supervisor or loop supervisor who has instructions to communicate such procedures to the reactor operators.

Sincerely yours,

E. T. Morris
E. T. Morris
General Manager