



Westinghouse
Electric Corporation
NRC-94-003

Commercial Nuclear
Fuel Division

Drawer R
Columbia SC 29250
(803) 776 2610

January 13, 1994

U.S. NUCLEAR REGULATORY COMMISSION
ATTN: Document Control Desk
Washington, DC 20555

Gentlemen:

SUBJECT: REPLY TO A NOTICE OF VIOLATION
REFERENCE: NRC Inspection Report No. 70-1151/93-09

Pursuant to the provisions delineated in Section 2.201 of the NRC's "Rules of Practice, Part 2, Title 10, Code of Federal Regulations, Westinghouse herein provides formal response to your letter of December 8, 1993, regarding your Region II Inspector W. B. Gloersen's inspection of the Columbia Fuel Fabrication Facility, conducted during the period October 25-29, 1993. In accordance with a December 16, 1993 telecon agreement between Mr. Charles Sanders of Westinghouse and Mr. Gloersen of your staff, the response to the subject notice of violation has been extended to January 14, 1994, due to personnel availability because of the Columbia Plant holiday shutdown.

The Appendix of this document provides our response to the violation of NRC requirements specified in the Notice of Violation.

I hereby affirm that the statements made in this response are true and correct to the best of my knowledge and belief. Should you have any questions, or require additional information, please telephone me at (803) 776-2610.

Sincerely,

WESTINGHOUSE ELECTRIC CORPORATION

J. A. Fici
James A. Fici, Plant Manager
Columbia Fuel Fabrication Facility

cc: U.S. Nuclear Regulatory Commission
Regional Administrator
101 Marietta Street, N.W.
Atlanta, GA 30323



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The Westinghouse Commercial Nuclear Fuel Division — Winner of the 1988 Malcolm Baldrige National Quality Award.

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APPENDIX

WESTINGHOUSE RESPONSE TO THE ITEM OF NONCOMPLIANCE IDENTIFIED IN THE NRC NOTICE OF VIOLATION

The following information is provided in response to the Inspector's observations that (1) selected shipping paper descriptions for seven LLRW shipments were not listed on consecutively numbered pages, nor were the correct total number of pages containing all the required information notated, (2) shipping papers for an August 3, 1993 LLRW consignment did not include an emergency response telephone number, (3) shipping paper descriptions for seven LLRW consignments were listed improperly as having reportable quantities (RQ) of radioactive materials, and (4) shipping paper descriptions for seven shipments of LLRW did not include the description of the hazardous material as "Fissile Exempt".

I. ACKNOWLEDGEMENT OF THE VIOLATION

The violation is correct as stated in the Notice of Violation.

II. REASON FOR THE VIOLATION

A review of the Columbia Plant transportation program revealed the following weaknesses:

- Various elements of the transportation program were administered by several independent departments. There was no administrative policy/procedure which established the overall guidelines, responsibilities and objectives for the program to assure that all program elements were properly managed in an integrated fashion. This weakness resulted in inadequate procedures for use by personnel responsible for implementing transportation requirements. These operating procedures lacked sufficient detail necessary to adequately depict the program requirements. Compliance with applicable requirements depended solely upon the knowledge of the cognizant individuals responsible for completing the necessary paperwork.
- There was a lack of management oversight to assure that all requirements are met.

III. IMMEDIATE ACTION TAKEN AND RESULTS ACHIEVED

Actions have been taken to assure that the specific errors identified in Inspection Report 93-09 for the applicable shipping paper documentation were corrected and that shipping documents generated since the inspection were completed in accordance with regulatory

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requirements. These actions included a review of the applicable requirements and assurance that the cognizant individuals completing the paperwork, including substitute or backup personnel, were knowledgeable of the requirements.

An audit checklist practice has been initiated as an overcheck to assure continued compliance with applicable requirements until the actions identified in Paragraph IV below are completed.

The above actions have been effective in correcting shipment documentation deficiencies and for assuring that shipments are being performed in accordance with applicable requirements.

IV. ACTIONS TO PREVENT RECURRENCE

To avoid a recurrence of the observation, a Columbia Plant Hazardous Materials Transportation ("umbrella") Procedure is being developed to identify the key program components, specify department responsibilities, and document regulatory requirements, to assure that detailed programmatic guidance is provided. This Procedure will define responsibilities, including those persons generating the criteria and of persons implementing the program; to define the documents required to assure compliance; to identify the requirements for record keeping and training for all applicable personnel; and to require audits of the program for compliance. This procedure will be completed and implemented by February 28, 1994. Following approval of this document, specific operating procedures will be generated. The schedule for implementation of the operating procedures will also be developed by February 28, 1994.

V. DATE WHEN FULL COMPLIANCE WAS ACHIEVED

Full compliance has been achieved.