



November 27, 1990

Mr. G.A. Arlotto, Deputy Director
Office of Nuclear Material Safety and Safeguards
U. S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Rockville, Maryland 20852

Dear Mr. Arlotto:

I appreciated the opportunity to meet with you and other NRC staff members on November 6, 1990. For your convenience and information, I am enclosing herewith a copy of the slides that Mr. A. E. Scherer presented at our opening meeting. Hopefully, the fuel facility tour and discussions held throughout the day will reinforce in your mind the progress Combustion Engineering has made over the past few years.

I would also like to take this opportunity to restate my perception of our current status. To assist your review I have, to the extent possible, followed the guidelines in T.E. Murley's November 1, 1989, memorandum to J.M. Taylor, "Proposed Guidelines for Removal of Plants from the Nuclear Regulatory Commission Watchlist."

Root Cause Identified and Corrected

The root causes of our previously weak performance areas have been clearly defined and corrected via a comprehensive program which is already in place. I believe our demonstrated and sustained successful operations, our verification program and the elimination of the operations which had previously involved radiological risk, were demonstrated to you. Additionally, longer term corrective measures have been instituted to prevent recurrence of our earlier problems.

Improved Self-Assessment and Problem Resolution

I believe, in our presentations and during your plant tour, we provided examples of programs and methods by which we achieve self-identification and resolution of safety problems. Our program elements also monitor and evaluate the effectiveness of corrective actions.

9012140205 901127
PDR ADOCK 07001100
C PDC

ABB Combustion Engineering Nuclear Power

Shelby T. Brewer
President

Combustion Engineering Inc.
1000 Prospect Hill Road
Post Office Box 500
Windsor, Connecticut 06095-0500

Telephone (203) 285-5805
Fax (203) 285-4933

NF12

Mr. G.A. Arlotto
November 27, 1990
Page 2

Internal communications and coordination have been established to assure that safety issues are being identified to the appropriate level of management and corrected in a timely manner. Our cultural process is becoming stronger, resulting in a nuclear safety work ethic and willingness of workers and supervisory staff to identify problems and participate in their timely resolution. In addition, our quality assurance and safety oversight groups are providing timely and effective self-assessments, independent of the Windsor fuel facility staff, to site and corporate management.

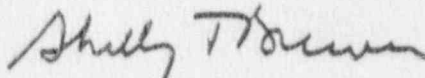
Organization and Oversight

I believe we now have a stable and competent corporate and plant management team that has accepted and implemented corrective actions and is fully committed to achieving improved performance. We also provide an effective corporate management oversight through the Independent Safety Committee that reports directly to me. Our management team provides strong direction and is fostering a strong nuclear safety ethic that is understood, and has been demonstrated at all levels throughout the organization.

I hope that the information provided to you on November 6, 1990, and summarized herein, will assist you in your review.

Once again, we appreciate the time and effort you took to visit the Windsor facilities and welcome your return at any time. If I can be of any additional assistance in this matter please feel free to call me.

Very truly yours,



Shelby T. Brewer

STB:k11

cc: R.M. Bernero
T.T. Martin

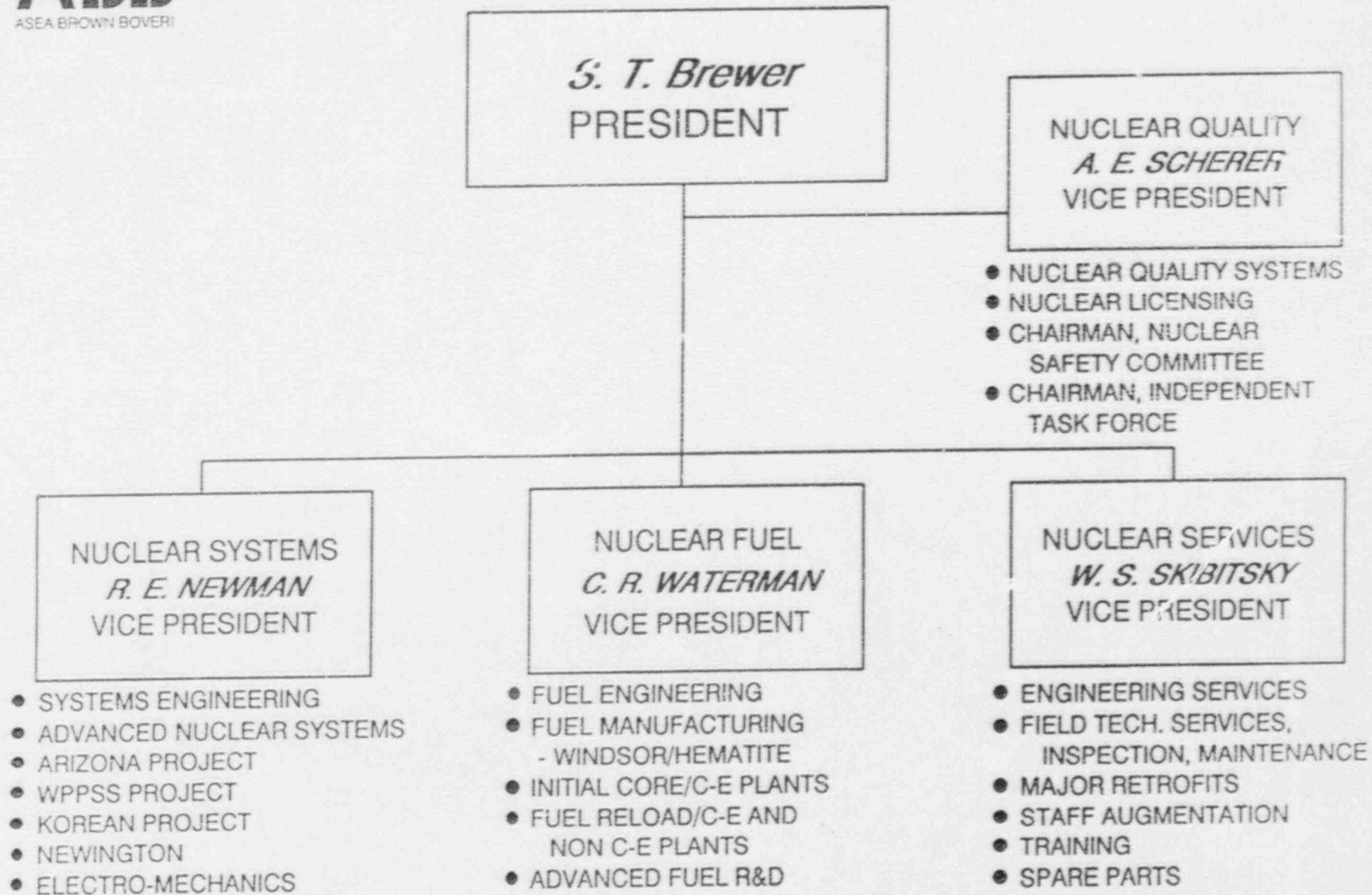
NRC REGION I VISIT TO WINDSOR FUEL FACILITY
DATE OF VISIT: NOVEMBER 6, 1990

Agenda

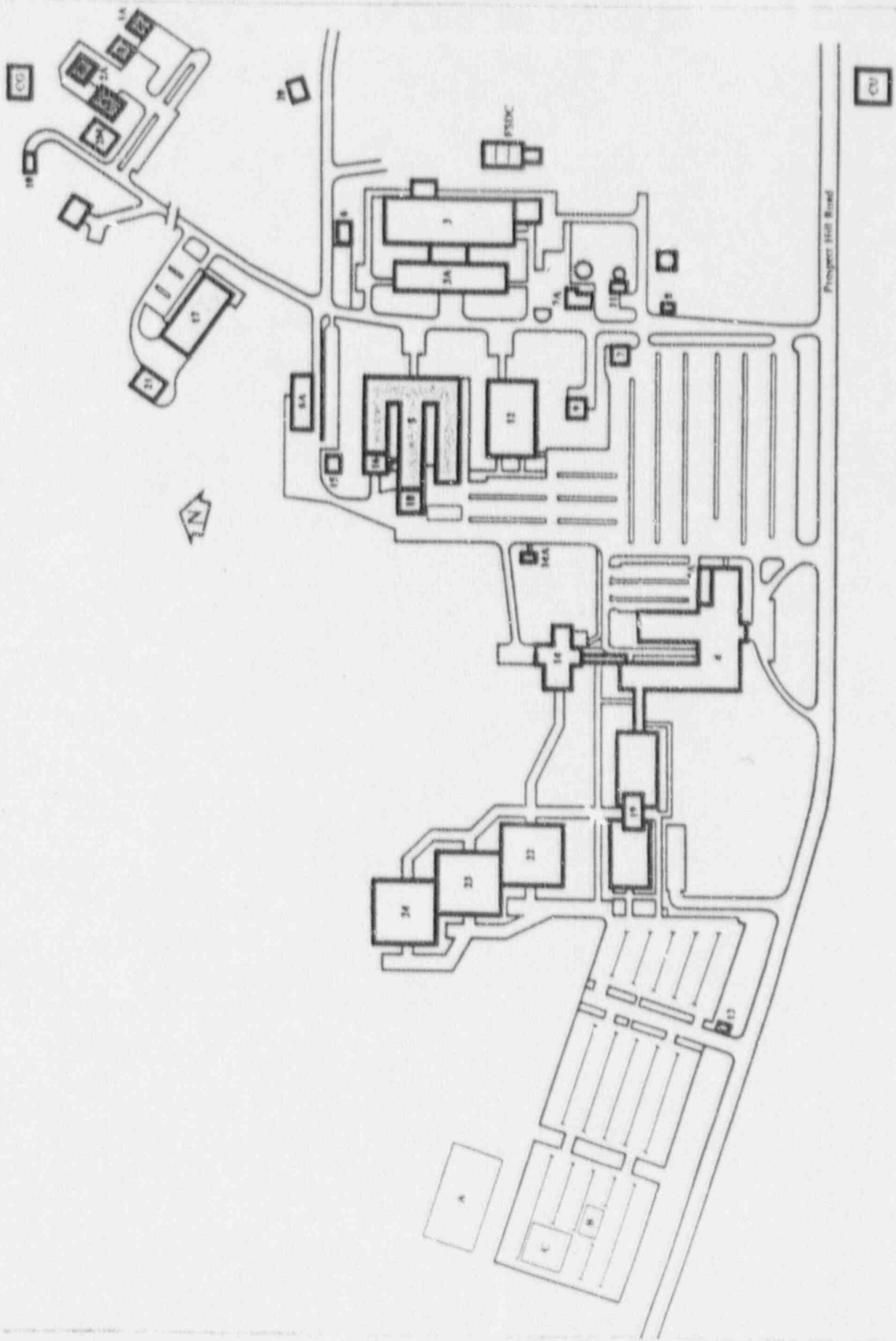
<u>Time</u>	<u>Activity</u>
8:30-9:00 am	NRC Party Arrives, Introductions
9:00-12:00 am	Bldgs. 17 & 21 Tour
12:05-1:00 pm	---LUNCH---
1:00-1:30 pm	Continue with Tour and/or Meet with Plant Manager's Direct Reports
1:35-2:35	Bldg. 2 Tour
2:40-3:15 pm	Discussion, Question and Answer Session
3:15-3:45 pm	Concluding Discussion



ABB Combustion Engineering Nuclear Power



WINDSOR SITE PLAN



- 0 EFFECTIVE, INTEGRATED MANAGEMENT IS IN PLACE
- 0 DEMONSTRATIVE IMPACT EVIDENT
 - RADIOLOGICAL PROGRAM
 - CRITICALITY PROGRAMS
 - CULTURE/ATTITUDE
- 0 PROBLEM IDENTIFICATION AND RESOLUTION PROCESS
IN PLACE

WINDSOR NUCLEAR FUEL MANUFACTURING FACILITY CHRONOLOGY OF EVENTS

Regional Administrator

Director, Div. RS&S

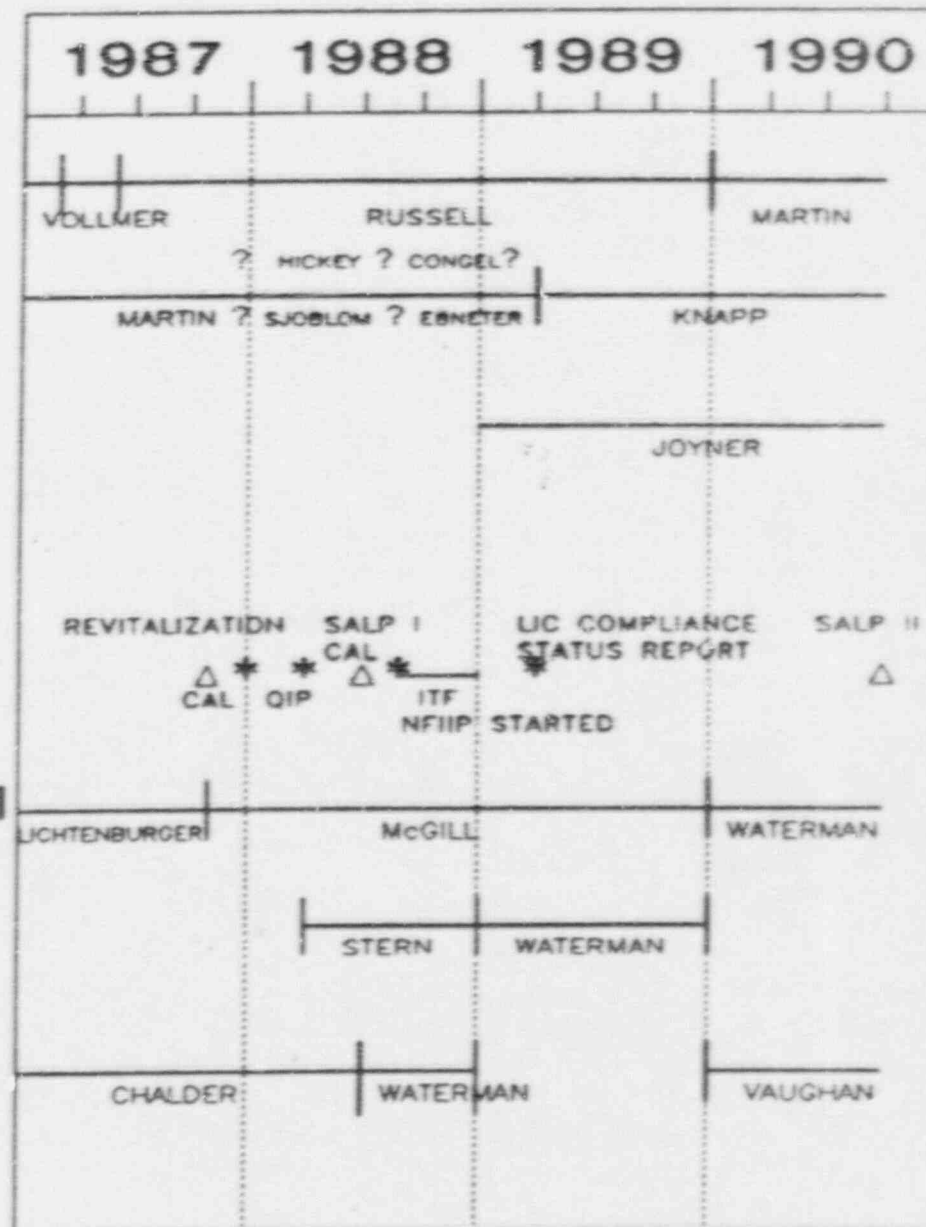
Div. Project Manager
(Previously Branch Chief, NMS&S)

Significant Milestones

Vice President, Nuclear Fuel

Vice Pres., Nuc. Fuel Man.

Plant Manager



INTEGRATED MANAGEMENT SYSTEM

- 0 INITIATED IN 1988
- 0 CREATED INTEGRATED SET OF PROGRAMS,
PROCEDURES, GUIDELINES AND INSTRUCTIONS
- 0 CREATED AND IMPLEMENTED AN EFFECTIVE
CONFIGURATION MANAGEMENT SYSTEM
- 0 PROVIDED CLEAR AND CONCISE RESPONSIBILITIES

MANAGEMENT OVERSIGHT

- 0 ELEVEN AUDIT, INSPECTION, SURVEILLANCE AND REVIEW FUNCTIONS ARE CONDUCTED AT FIVE DIFFERENT MANAGEMENT LEVELS
- 0 INDEPENDENT AUDITS ARE THE RESPONSIBILITY OF THE NUCLEAR SAFETY COMMITTEE

EMERGENCY PREPAREDNESS

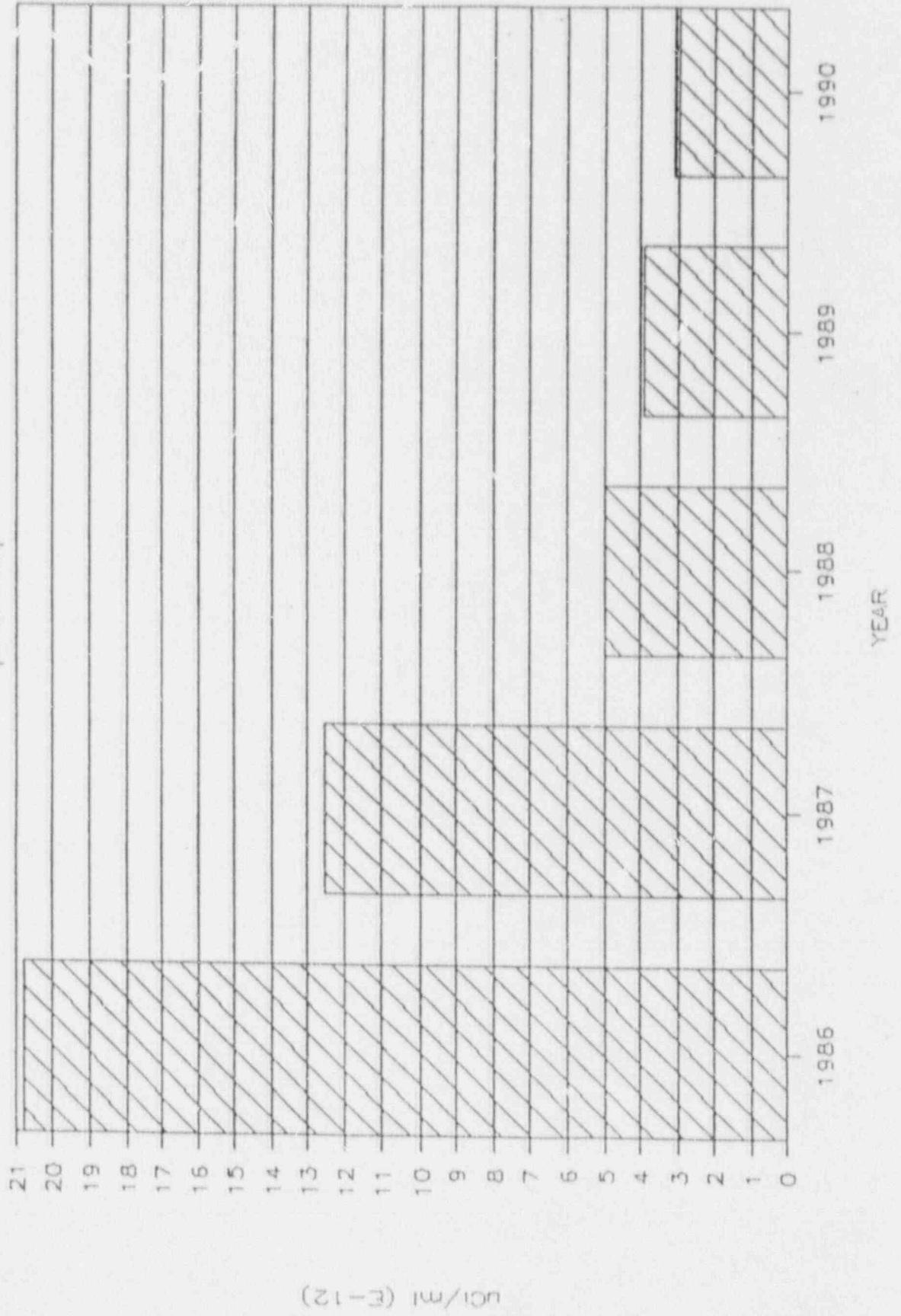
- 0 EMERGENCY PLAN IMPLEMENTING PROCEDURES (EPIP)
WERE DRAFTED AND ISSUED
- 0 EPIP'S INTEGRATE RESPONSE FROM OTHER ON-SITE
AND OFF-SITE ORGANIZATIONS
- 0 EPIP'S EXERCISED IN SEVERAL DRILLS
- 0 AN EMERGENCY PLAN SUPPLEMENT IS BEING
PREPARED TO SHOW THAT DOSES DO NOT EXCEED
LIMITS

RADIOLOGICAL SAFETY

- 0 BEGAN PHYSICAL IMPROVEMENTS IN 1988, SHORT TERM INVESTMENT IN EXCESS OF \$750,000
- 0 IMPLEMENTED INTEGRATED RADIOLOGICAL PROTECTION PROGRAM (PROGRAM DOCUMENT AND IMPLEMENTING INSTRUCTIONS)
- 0 MOVED PELLETIZING AND GRINDING TO HEMATITE, MO.
- 0 HIRED A PROFESSIONAL HEALTH PHYSICIST AS MANAGER, RADIOLOGICAL PROTECTION AND INDUSTRIAL SAFETY

AIRBORNE RADIOACTIVITY

pellet shop



WINDSOR NUCLEAR FUEL MANUFACTURING

TYPICAL CONTAMINATION LEVEL

COMPARISON (DPM/100 CM²)

(1987 VS 1990)

<u>YEAR</u>	<u>< 5000 (NO CLEAN-UP REQ'D)</u>	<u>>5000 <10,000 (24 HR CLEAN-UP REQ'D)</u>	<u>>10,000 (IMMED CLEAN-UP REQ'D)</u>
1987 (109 SMEARS)	35%	17%	48%
1990 (1500 SMEARS)	99.47%	0.13%	0.40%

- NOTES:
1. 1987 SURVEY PERFORMED ON 9/6/87
 2. 1990 -- 1ST SIX MONTHS