70-1201

B&W FUEL COMPANY

An American Company with Worldwide Resources

P.O. Box 11646
Lynchburg, VA 24506-1646
Telephone: 804-522-6000

January 7, 1991

Mr. Charles Haughney
Uranium Fuel Section
Fuel Cycle Safety Branch
Division of Industrial and
Medical Safety, NMSS
Nuclear Regulatory Commission
Washington, D.C. 20555

REFERENCE: SNM-1168 License, Docket 70-1201

Dear Mr. Haughney:

B&W Fuel Company submitted an upgraded Radiological Contingency Plan (RCP) to the NRC on October 17, 1990. On October 18, 1990 pages 32 and 33 were submitted to replace the incorrect pages sent with the October 17 document. However, I failed to redate pages 32 and 33 or implicate that they were a revision to the October 17 document. To rectify this error, I am resubmitting pages 32 and 33 reflecting a new date and revision 1. Please disregard the October 18 correspondence and replace the RCP with the correct pages included in this submittal.

Chapter 8 of our SNM license has also been modified to include the revision date of the RCP.

Six copies of the revised pages of the RCP and Chapter 8 have been provided.

If you should have any questions regarding the new RCP, please feel free to contact me at (804) 522-6202.

Sincerely,

B&W FUEL COMPANY
COMMERCIAL NUCLEAR FUEL PLANT

Kathryn S. Lester

Kathryn S. Lester
Manager, Safety & Licensing

cc: NRC Region II
101 Marietta st, n.w.
Atlanta, GA 30323

NF-12

8.0 RADIOLOGICAL CONTINGENCY PLAN

The B&W Fuel Company, Commercial Nuclear Fuel Plant shall maintain and execute the capability for handling emergencies in accordance with the Radiological Contingency Plan submitted to the Commission on October 17, 1990 and January 7, 1991.

The B&W Fuel Company, Commercial Nuclear Fuel Plant will make no changes to the Plan which would decrease its effectiveness without prior approval of the USNRC.

Changes, which do not decrease the effectiveness of the Emergency Plan, will be reported within six months of the change to the Chief, Fuel Cycle Safety Branch, Division of Industrial and Medical Nuclear Safety, NMSS, Washington, D.C. 20555.

The requirements of the Plan shall be implemented through approved written procedures maintained by the licensee.

2. Laboratory analytical capability at the NNFD-RL and NNFD (gross alpha, beta, gamma counting spectrum analysis).
3. Portable instrumentation from NNFD-RL and NNFD.
4. Meteorological information from the National Weather Services Station or from the Virginia Office of Emergency Services.

7.0 Maintenance of Radiological Contingency Preparedness Capability

7.1 Written Procedures, Review, and Updating

The Manager, Quality and Safety is responsible for assuring that the Emergency Procedure is reviewed for technical correctness and applicability at least once each year, and updated as appropriate. Revised procedures are approved by cognizant members of plant management. Procedures distribution and control shall be the responsibility of plant supervision.

Health-Safety procedures are approved in writing by members of plant management/supervision if it is determined by Quality and Safety that their area of responsibility is affected by the procedure.

7.2 Training

Training in emergency response begins with the indoctrinat· n of each new employee. Health-Safety conducts the new employee indoctrination in accord with 10 CFR 19. A formal documented retraining of radiation workers shall be conducted by Health-Safety at least annually.

The officers of the Emergency Organization shall meet on an annual basis to review an refresh the emergency procedures and their respective roles they play in emergencies.

The Emergency Rescue Team and Radiation Monitoring Teams receive annual training programs which include fire fighting techniques and rad monitoring techniques, respectively. Both teams are familiarized with new and old equipment. The teams are familiarized with the unique hazards associated with radioactive materials. The teams

are trained in the use of protective equipment and are medically qualified annually for respirator use. Members of the local fire department tour the plant on an annual basis or as otherwise mutually agreed. General employee training requirements for emergency monitoring personnel is specified in Chapter 2 of SNM-1168.

7.3 Tests and Drills

Emergency drills and exercises are conducted to test the adequacy of timing and content of implementing procedures, to test emergency equipment, and to ensure that emergency organization personnel are familiar with their duties. A critique after the drill will take place to note any deficiencies and/or improvements that can be made. A planned evacuation will be conducted annually for CNFP personnel. Emergency drills (or a combined drill) of plant medical emergency and radiological monitoring capabilities will be held at least annually.

7.4 Maintenance and Inventory of Radiological Emergency Equipment, Instrumentation, and Supplies

Equipment, supplies, and instruments held in readiness for emergency use are inventoried and functionally tested on a quarterly basis. Calibration of instruments is performed semi-annually.

8.0 Records and Reports

8.1 Records of Incidents

Record forms are maintained in the CNFP Emergency Procedure. The record forms will document personnel statements concerning the incident, radiation survey data, evacuation checks, Health-Safety checks, Radiation Monitoring, and Environmental Monitoring. Logbooks or equivalent will be used to record the cause of the incident, corrective actions taken to terminate the emergency including the extent of injury or damage, offsite assistance requested, offsite assistance actually received, and offsite organizations to which the situation was reported, and the action taken or planned to prevent a recurrence of the incident.