



70-1151

Westinghouse
Electric Corporation

Commercial Nuclear
Fuel Division

Drawer F
Columbia SC 29250
(803) 776 2610

January 31, 1991

U. S. Nuclear Regulatory Commission
ATTN: Mr. George Bidinger, Section Leader
Uranium Fuel Section
Fuel Cycle Safety Branch
Division of Industrial and Medical Nuclear Safety, NMSS
Washington, DC 20555

Dear Mr. Bidinger:

REF: LICENSE SNM 1107/RADIOLOGICAL CONTINGENCY PLAN UPDATE
ANSWERS TO QUESTIONS SUBMITTED ON 10/10/90

Westinghouse Electric Corporation hereby submits a formal response to the questions generated upon review of the Site Emergency Plan dated April 30, 1990 and the request dated June 20, 1990 to incorporate the plan into the existing license. Modifications in the plan have been made to achieve the desired regulatory condition. The changes have also been submitted to the respective outside agencies for their review and 60 day comment period.

Also, enclosed are the following page changes in License SNM-1107: Pages iii, vi, ix, and 2.5-1 which are required to complete the Emergency Plan revision and incorporate it into the existing license. Please review the attached correspondence, and contact me at (803)-776-2610, Extension 3247, if you have any further concerns regarding the Site Emergency Plan revision submittal.

Sincerely,

WESTINGHOUSE ELECTRIC CORPORATION

Edward K. Reitler, Manager
Regulatory Engineering

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RESPONSE TO EMERGENCY PLAN QUESTIONS 10/10/90

QUESTION 1 - Section 3.2.9

Our existing procedure was derived from our corporate security plan, but we are revising the initial statement to include "the information will be documented" and... to more accurately describe the security plan procedure.

QUESTION 2 - Section 4.5.1 Item 1

The word scenario will be changed to "event" and the listing will include types of radioisotopes and/or hazardous materials released.

QUESTION 3 - Section 6.2.1.1

The cellular telephone will be tested once during each month.

QUESTION 4 - Section 6.5.1

The following will be added: The operability of the field meteorological unit will be verified during the annual calibration.

QUESTION 5 - Section 7.2.4

The following will be added: Training sessions will be conducted a minimum of four times per year under the direction of the Regulatory Engineering safety engineer.

QUESTION 6 - Section 7.2.6

The following will be added: Offsite group training will be offered annually.

QUESTION 7 - Section 7.3

The following will be added: These drills will be performed biennially on each shift in the years in which exercises are not required.

QUESTION 8 - Section 7.4

The following will be added: The official critique will be conducted by the controller group and an individual outside the Regulatory Affairs department. The emergency plan administrator will review the critique, assign responsibilities for corrective action, and assure deficiencies are corrected.

QUESTION 9 - Section 7.5

The following will be added to the first sentence on page 7.4 : " ...; and they will be allowed 60 days to comment on the revised plan prior to submitting the revision to the Nuclear Regulatory Commission."

SCHEDULE OF REVISIONS

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REVISION RECORD

<u>Revision Number</u>	<u>Date of Revision</u>	<u>Pages Revised</u>	<u>Revision Reason</u>
13	7/23/87	New pages 1.11-6 through 1.11-8.	Added authorization for off-site drying of calcium fluoride.
14	8/14/87	Revised page 4.5-1.	Added drying of calcium fluoride to scope of operations.
		Revised pages 4.8-1 and 4.8-2.	Delete Western Zirconium as an authorized recipient of HF.
		Revised page 4.1-1.	Update document date.
		Revised pages 1.11-2, 1.11-4, 1.11-5, and 1.11-6.	Added encapsulated materials to briquetting description.
15	8/18/87	New pages 1.14-1 thru 1.14-5 and 2.2-14.	Added criteria to preclude foreign contaminants from UF ₆ cylinders.
16	1/25/88	Revised page 2.2-3.	Add interlock pressure requirement positive pressure gloveboxes.
17	2/8/88	Revised page 2.5-1.	Update of Emergency Plan Section.
18	5/25/88	Revised page 2.5-1.	Update of Emergency Plan Section.
19	8/12/88	Revised page 2.5-1.	Update of Emergency Plan Section.
20	9/30/88	Revised pages 2.1-2, 2.1-3, 2.2-9 and 2.2-10.	Add frequency criteria to the definitions Section. Revised criteria for bulk containers.
21	6/23/89	Revised page 2.5.1	Update of Emergency Plan Section.
22	1/30/91	Revised page 2.5.1	Incorporate Site Emergency Plan into license, to replace Radiological Contingency Plan

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- 2.4.2 Nonroutine and emergency operations involving SNM shall be performed only after the particular operation has been approved by the appropriate line management function and the Radiation Protection Component, consistent with the urgency of the situation in the event of an emergency. All equipment specified as necessary to the operation by the line management function and radiation protection function shall be provided and operative.
- 2.4.3 A continuing program of surveillance, air sampling and smear sampling which is adequate to detect ventilation deficiencies and assure compliance with 10 CFR 20 limits, shall be conducted.
- 2.4.4 UF6 cylinders shall have valve covers in place when being moved except for those which have been processed and evacuated. In the event that it is not practical to attach a valve cover to the cylinder, they may be transported without the valve covers provided that a supervisor or designee escort is provided (in addition to the individual operating the transport equipment), and the personnel involved with the transfers shall be knowledgeable in emergency actions to be taken in event of damage to the cylinder valve during the transfers.
- 2.4.5 Unless specifically exempted by license conditions, Westinghouse shall comply with the provisions of Title 10, Chapter 1, Code of Federal Regulations, Parts 19 and 20.
- 2.4.6 A Site Physical Security Plan and implementing procedures shall be maintained in accordance with 10 CFR 73.67.
- 2.5 Emergency Plan
Until January 30, 1991 Westinghouse shall implement, maintain, and execute the response measures of the Radiological Contingency Plan, submitted to the Commission on September 30, 1981, and supplemented on July 20, 1983, February 24, June 1, July 24, and September 11, 1984, July 18, 1985, September 18, 1986, January 29, 1986, February 8, 1988, April 29, 1988, August 12, 1988 and June 23, 1989. Effective January 30, 1991 Westinghouse shall implement, maintain and execute the response measures of the Site Emergency Plan submitted to the Commission on April 30, 1990, and supplemented on January 30, 1991. Westinghouse shall also maintain implementing procedures for the Site Emergency Plan as necessary to implement the Plan. This Site Emergency Plan and associated implementing procedures supersede the emergency planning requirements of 10 CFR 70.22(i) as they refer to onsite planning and notification procedures. Westinghouse shall make no change in the Site Emergency Plan that would decrease the response effectiveness of the Plan without prior Commission approval as evidenced by a license amendment. Westinghouse may make changes to the Site Emergency Plan without prior Commission approval if the changes do not decrease the response effectiveness of the Plan. Westinghouse shall