

April 24, 1998

Westinghouse Electric Corporation
ATTN: Mr. J. B. Allen, Manager
Columbia Plant
Commercial Nuclear Fuel Division
Drawer R
Columbia, SC 29250

SUBJECT: PUBLIC MEETING SUMMARY (PERFORMANCE REVIEW)

Dear Mr. Allen:

This letter refers to our meeting at the Westinghouse Columbia Plant on April 16, 1998, during which we discussed the NRC evaluation of your performance in the five major areas of safety operations, safeguards, radiological controls, facility support and licensing activities. The meeting also afforded you the opportunity to provide feedback to the NRC regarding your self assessment and perception of the NRC performance review. We appreciate the information you provided during the meeting regarding your intentions to increase management oversight of your licensed operations to ensure regulatory and safety compliance. Specifically, we were encouraged to learn of your Safety Margin Improvement Program team initiatives that target many of the program weaknesses identified in the NRC's assessment.

As a result of our assessment, we intend to increase our inspections in the areas of management controls and nuclear criticality safety, decrease our inspections in the areas of operator training and radiological controls, and maintain normal inspection activities in the other areas.

The names of attendees at the meeting and copies of the presentations used by you and the NRC are contained in Enclosures 1 through 3.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosures will be placed in the NRC Public Document Room.

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Should you have any questions concerning this letter, please contact us.

Sincerely,

(original signed by
E. J. McAlpine)

Edward J. McAlpine, Chief
Fuel Facilities Branch
Division of Nuclear Materials Safety

Docket No. 70-1151
License No. SNM-1107

Enclosures: 1. List of Attendees
2. NRC Presentation
3. Licensee Presentation

cc w/encls:
Wilbur Goodwin, Manager
Regulatory Affairs
Westinghouse Electric Corporation
Commercial Nuclear Fuel Division
Drawer R
Columbia, SC 29250

Max Batavia, Chief
Bureau of Radiological Health
S. C. Department of Health
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D. Ayres, RII
P. Harich, NMSS
P. Hiland, RIII
C. Cain, RIV
F. Wenslawski, RIV
C. Paperiello, NMSS
E. Ten Eyck, NMSS
W. Brach, NMSS
P. Ting, NMSS
M. Weber, NMSS
C. Gaskin, NMSS
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Distribution w/o encls: See Page 3

LIST OF ATTENDEES

April 16, 1998

U. S. Nuclear Regulatory Commission

- E. Ten Eyck, Director, Division of Fuel Cycle Safety and Safeguards,
Office of Nuclear Material Safety and Safeguards
- J. Johnson, Deputy Regional Administrator, Region II (RII)
- D. Collins, Director, Division of Nuclear Materials Safety (DNMS), RII
- E. McAlpine, Chief, Fuel Facilities Branch (FFB), DNMS, RII
- R. Hannah, Public Affairs Officer, RII
- D. Ayres, Sr. Fuel Facility Inspector, FFB, DNMS, RII

Westinghouse Electric Corporation *

- J. Fici, Vice President and General Manager, Commercial Nuclear Fuel Division
- J. Allen, Plant Manager, Columbia Fuel Fabrication Facility (CFFF)
- W. Goodwin, Manager, Regulatory Affairs (RA), CFFF
- R. Williams, Advisory Engineer, RA, CFFF
- J. Bush, Manager, Manufacturing, CFFF
- S. McDonald, Manager, Technical Services, CFFF
- J. Heath, Manager, Regulatory Engineering and Operations (REO), CFFF
- N. Parr, Manager, Chemical Process Engineering (CPE), CFFF
- N. Kent, Senior Engineer, RA, CFFF
- B. Ervin, Senior Engineer, CPE, CFFF
- E. Reitler, Fellow Engineer, REO, CFFF
- T. Shannon, Technician, RA, CFFF

* Other licensee employees also attended.

Enclosure 1

LICENSEE PERFORMANCE REVIEW FOR WESTINGHOUSE ELECTRIC COMPANY
ASSESSMENT PERIOD: January 1, 1996 - January 31, 1998

SAFETY OPERATIONS (Comprised of Criticality Safety, Plant Operations, Fire Safety, and Management Controls)

Program Strengths

- Effective and comprehensive Fire Safety program
- A computerized procedure control system that assures only the proper revision is available for use by workers

Areas Needing Improvement

- Ensuring that adequate safety evaluations are conducted and that criticality controls are adequately implemented and maintained in accordance with license safety requirements
- Developing or implementing various procedures and policies that cover other requirements such as criticality safety license conditions and event reporting
- Thoroughness and timeliness of Incident Investigations and Root Cause Analyses
- Implementing an effective surveillance, audit, and self-assessment program
- Implementing the Configuration Control program
- Management control over non-routine activities
- Maintaining required records under the Document Control system

Projected Challenges to Performance

- Keeping the Pre-Fire Plan updated
- Developing and implementing of policies, procedures, and training to assure that management's expectations are met
- Implementing the Regulatory Process Review Committee's goals and objectives
- Continuing to improve communications with NRC

LICENSEE PERFORMANCE REVIEW FOR WESTINGHOUSE ELECTRIC COMPANY
ASSESSMENT PERIOD: January 1, 1996 - January 31, 1998

SAFEGUARDS (Comprised of Material Control and Accountability and Physical Security)

Program Strengths

- None

Areas Needing Improvement

- Resolving measurement control bias
- Physical security during emergency drills

Projected Challenges to Performance

- Ensuring that the MC&A department reorganization does not adversely affect its performance

LICENSEE PERFORMANCE REVIEW FOR WESTINGHOUSE ELECTRIC COMPANY
ASSESSMENT PERIOD: January 1, 1996 - January 31, 1998

RADIOLOGICAL CONTROLS (Comprised of Radiation Protection, Environmental Protection, Waste Management, and Transportation)

Program Strengths

- Maintaining occupational doses as Low As Reasonably Achievable (ALARA)
- Maintaining decommissioning records
- Effective waste minimization program

Areas Needing Improvement

- None

Projected Challenges to Performance

- Maintaining stack sample delivery system representativeness
- Completing investigation of elevated radioactivity in groundwater samples and developing any needed actions
- Completing review of increased concentrations of uranium in the liquid effluent and developing needed actions

LICENSEE PERFORMANCE REVIEW FOR WESTINGHOUSE ELECTRIC COMPANY
ASSESSMENT PERIOD: January 1, 1996 - January 31, 1998

FACILITY SUPPORT (Comprised of Maintenance and Surveillance, Emergency Preparedness, and Training)

Program Strengths

- Providing good safety and transportation training programs and training materials
- Providing thorough Emergency Preparedness training
- Conducting realistic emergency drills

Areas Needing Improvement

- Assuring that the computerized Maintenance Planning and Control (MAPCON) system is effective in maintenance and surveillance program implementation.
- Assuring proper training on Material Control and Accountability (MC&A) requirements
- Assuring that the emergency response organization can be effectively activated during off-hours
- Assuring that the emergency meteorological tower reliably provides needed information

Projected Challenges to Performance

- Integration of the Integrated Safety Analysis (ISA) results into procedures and MAPCON
- Identification and clarification of preventive maintenance (PM) requirements to ensure these are supported by procedure
- Ensuring that the Emergency Operations Center is adequate to support State and NRC response

LICENSEE PERFORMANCE REVIEW FOR WESTINGHOUSE ELECTRIC COMPANY
ASSESSMENT PERIOD: January 1, 1996 - January 31, 1998

SPECIAL TOPICS (LICENSING ACTIVITIES)

Program Strengths

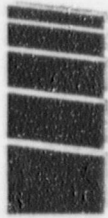
- Proactive in revising and updating the Fundamental Nuclear Material Control (FNMC) Plan to incorporate improvements in the MC&A program

Areas Needing Improvement

- None

Projected Challenges to Performance

- Continuing development of the ISA
- Maintaining competency in technical staffing



Westinghouse Commercial Nuclear Fuel Division
Columbia Plant

1998 WESTINGHOUSE LICENSEE PERFORMANCE REVIEW

April 16, 1998



SAFETY OPERATIONS

Criticality Safety, Plant Operations, Fire Safety, and Management Controls

- Program Strengths
 - Criticality engineering skills and technical capabilities and the use of fault trees to demonstrate Double Contingency Protection
 - Chemical Process Safety employee involvement and training, "Umbrella" Procedure, and Environmental Health and Safety Plan Section
 - Effective and comprehensive Fire Safety Program
 - Interdisciplinary Review and Approval of Process Changes - Change Authorization / Configuration Management
 - OSHA, ANI, Corporate and Internal Safety Audits



SAFETY OPERATIONS

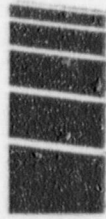
- Areas Needing Improvement
 - Revision for clarification of SNM License Criticality Safety Chapter
 - Criticality safety document filing and retrieval
 - Process upset notification consistency and broad root cause analysis
 - Management oversight of procedure compliance for unique processes and operations



SAFETY OPERATIONS

- Projected Challenges to Performance
 - OSHA PSM Plan renewal (on-site) and EPA RMP development (off-site)
 - Addressing Fire Hazard Analysis for Hot Oil Dryers and updating pre-fire plans
 - Implementing comprehensive safety-related control process (reliability and availability)
- Major Initiatives
 - Safety Margin Improvement Program Actions for Safety Operations





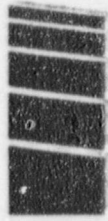
SAFEGUARDS

Material Control and Accountability, and Physical Security

- **Program Strengths**
 - Automated item control, measurement control, and inventory systems (world-wide recognition)
 - Routine access control and surveillance (good industrial security)
- **Areas Needing Improvement**
 - Comprehensive and timely security actions during emergency response



SAFEGUARDS



- Projected Challenges to Performance
 - Coordination of Material Control and Accountability functional responsibilities across Columbia Plant
- Major Initiatives
 - Continuing waste/scrap reduction, and enhanced item controls to approach a "real-time" (dynamic) SNM inventory



RADIOLOGICAL CONTROLS

Radiation Protection, Environmental Protection, Waste Management and
Transportation

- Program Strengths
 - As Low As Reasonably Achievable (ALARA) Program
 - Comprehensive radiological monitoring with results well below limits
 - Reductions in air and liquid effluents, and waste, especially:
 - Ammonia emission less than 100 #/day
 - Low-level radiological waste buried: 24,000 ft³ (1985) reduced to 600 ft³ (1997)
 - Westinghouse shipping containers refurbished before each use



RADIOLOGICAL CONTROLS

- **Areas Needing Improvement**
 - Assure concentrations of uranium in facility liquid effluent discharges are ALARA
- **Projected Challenges to Performance**
 - Ground water chemical and beta analyses and action planning
 - International shipments in light of escalating and uncertain restrictions
- **Major Initiatives**
 - Proactively assessing shipping container program to address key industry issues



FACILITY SUPPORT

Maintenance and Surveillance, Emergency Preparedness and Training

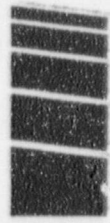
- Program Strengths
 - Computerized maintenance planning and procedures systems
 - Skilled, experienced crafts people implementing rigorous configuration control
 - Emergency plan coordination with local agencies
 - Performance-based orientation and refresher training
- Areas Needing Improvement
 - Upgrading training for an experienced workforce in a dynamic manufacturing environment -content and documentation



FACILITY SUPPORT

- Projected Challenges to Performance
 - Assuring continuing reliability and availability of all safety-related controls
 - Training and coordination of emergency drill elements
- Major Initiatives
 - Safety Margin Improvement actions to comply 10 CFR 50 quality concepts to meet 10 CFR 70 requirements
 - Training content and staffing enhancements

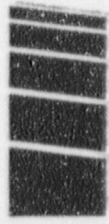




SPECIAL TOPICS: LICENSING

- Program Strengths
 - Voluntary, comprehensive performance-based License
 - Integrated Safety Assessment process
 - Proactive interface with NRC Staff and Management
- Areas Needing Improvement
 - Full implementation of license requirements to unique processes and products





SPECIAL TOPICS: LICENSING

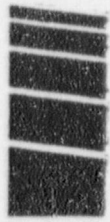
- Projected Challenges to Performance
 - Alignment and focus of resources, particularly regulatory specialties, on strict compliance
- Major Initiatives
 - Supplementing License with clarifications (“institutional memory”), and linkage to facility policies and procedures
 - Enhancing Regulatory Agency notification process



CONCLUSIONS

- Over 50 Million Employee-Hours worked since Plant startup without a death or serious injury, or a process upset impacting the public
- Strong fundamental safety and safeguards systems, and computerized linkage of key processes
- Enthusiastic safety and environmental conscience across the Plant population
- Recognize the challenge of implementing committed improvement initiatives while maintaining strengths in Plant operations
- Committed to Integrated Safety Assessments based on structured Process Hazard Analysis (PHA) of risks
- Implementing actions through the Westinghouse Safety Margin Improvement Program



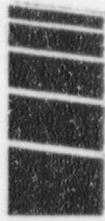


WESTINGHOUSE SMIP

Safety Margin Improvement Program

- SMIP Initiated.....January, 1993
- Total Program Initiatives.....67
- Initiatives Completed To Date.....49
- Initiatives Currently Active.....18



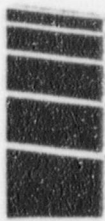


WESTINGHOUSE SMIP

Pertinent Improvement Initiatives Summary

- Interim Design Safety Basis (CSAs / CSEs)
Eight Tasks - Five Team Members - Complete 4Q99
- Quality Assurance and Maintenance of Safety Controls
Eight Tasks - Fourteen Team Members - Complete 4Q98
- Management of Change
Five Tasks - Seven Team Members - Complete 4Q98
- Compliance Quality Assurance
Twenty-five Tasks - Nineteen Team Members - Complete 4Q98
- License Requirements in Policies and Procedures
Six Tasks - Seven Team Members - Complete 4Q98





WESTINGHOUSE SMIP

Pertinent Improvement Initiatives Summary

- Incident Management and Notification
Six Tasks - Six Team Members - Complete 3Q98
- Recordkeeping and Document Control
Four Tasks - Nine Team Members - Complete 2Q98
- Final Design Safety Basis (ISA)
Nine Tasks - Fourteen Team Members - Complete 4Q02
- Management Oversight and Control
Three Tasks - Eleven Team Members - Complete 2Q98

