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February 14, 2012


SUBJECT: REPLY TO A NOTICE OF VIOLATION
REFERENCE: U.S. NUCLEAR REGULATORY COMMISSION INTEGRATED INSPECTION
REPORT NO. 070-1151/2011-005 AND NOTICE OF VIOLATION

Pursuant to the provisions of 10 CFR 2.201, Westinghouse Electric Company LLC (Westinghouse) herein provides a response to the NRC Integrated Inspection Report No: 070-1151/2011-005 and Notice of Violation, dated January 27, 2012. This inspection report addressed inspections of the Columbia Fuel Fabrication Facility (CFFF) conducted during the fourth quarter of calendar year 2011.

Appendix A provides a concise response to the violation of NRC requirements specified in the referenced inspection report. (NRC Inspection Report Number 070-1151/2011-005).

Should you have any questions or require additional information, please telephone Marc A. Rosser of my Staff at (803) 647-3174.

Sincerely,


David J. Precht, Plant Manager
Columbia Fuel Fabrication Facility
Westinghouse Electric Company LLC
License SNM-1107 Docket70-1151

Attachment: Appendix A

cc: U. S. Nuclear Regulatory Commission
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245 Peachtree Center AVE, NE Suite 1200
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U. S. Nuclear Regulatory Commission, Region II
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Attn: Christopher Ryder, Project Manager

APPENDIX A

WESTINGHOUSE RESPONSE TO NOTICE OF VIOLATION

NRC Inspection Report Number 070-1151/2011-005 identified a Severity Level IV Violation of NRC Requirements.

Violation: During an NRC inspection conducted September 26 through 30, 2011, a violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below:

10 CFR 70.62 requires, in part, that each licensee shall establish a safety program that demonstrates compliance with the performance requirements. One of the elements of the safety program is management measures.

10 CFR 70.62(d) requires, in part, that each licensee shall establish management measures to ensure compliance with the performance requirements. These measures shall ensure that items relied on for safety (IROFS) will be available and reliable to perform its intended function when needed, to comply with the performance requirements.

Contrary to the above, on and before September 30, 2011, the licensee failed to establish a safety program that would ensure that IROFS ADUHOS-906, a passive engineered control fire barrier, would perform its intended function when needed to comply with the performance requirements. Specifically, the licensee failed to seal multiple penetrations within IROFS ADUHOS-906 fire barrier.

A.1 The following information is provided in response to Violation VIO 70-1151/2011-005-01 for failure to establish management measures that would ensure that IROFS ADUHOS-906 would perform its intended function when needed to comply with the performance requirements.

A.1.a ACKNOWLEDGEMENT OF THE VIOLATION

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

A.1.b REASON FOR THE VIOLATION

The reason for the violation is that the execution of the inspection program for the hot oil system was less than adequate. This included the operational checks and the preventive maintenance program.

A.1.c CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

The specifics to repair the IROFS were entered into the Corrective Action system under issue report number CAPs# 11-271-C004. A work order was issued to make the needed repairs. The PM was revised to include additional instructions and team manager review with the performing mechanic to ensure the work is properly completed. EH&S provided guidance to the maintenance department on properly sealing the penetrations. Corrective Action system issue report number CAPs #11-

273-C010 was generated to evaluate and address the management measures pertaining to this NOV.

A.1.d ACTIONS TO PREVENT RECURRENCE

The maintenance department is developing a task specific MCP which is designed to provide detailed instructions on properly performing the inspection and where necessary repairs. This MCP will include pictorial steps showing non-compliant and compliant examples to assist the craft in the inspection and repair efforts. This will also include the approved materials for performing repair work. Once issued, a training session will be held with appropriate craft personnel. The estimated completion date for these actions is May 2012.

The works planning process is being enhanced to ensure that fire safety requirements are addressed specifically when work activities are conducted on NFPA complaint systems or equipment. The estimated completion date is June 2012.

Once the above MCP is issued, PM81085 will be revised to mandate its use in performance of the annual inspection. In addition, the MCP will be used to enhance the operations department procedural process for performing routine walk downs of the hot oil room. A training session or script based upon the MCP will be used to enhance the production staff awareness of the requirements. The operations procedure, COP-814001 and CF-81-028 will be revised to more clearly articulate the requirement. The estimated completion date for these actions is June 2012.

The above actions will be tracked to completion as part of CAPs #11-273-C010 by EH&S management.

A.1.e DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Compliance was achieved when the repairs were completed to properly seal all identified suspect penetrations. This restored the IROFS to a fully functional status. This work order was completed December 1, 2011.