

TELEPHONE CONVERSATION RECORD

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PERSON CALLED: Hank Sepp, D&D Project Manager
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LICENSE NO: SNM-00033

DOCKET NO.: 070-00036

CALLER: George M. McCann, Senior Health Physicist
Region III, Division of Nuclear Material Safety
Decommissioning Branch
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TELEPHONE NO.: (630) 829-9856

DATE OF CALL: March 22, 2004 (3:25 pm)

SUBJECT: REVIEW OF MARCH 18, 2004 WEC LETTER REQUESTING LICENSE
MODIFICATION TO ADDRESS INTERNAL APPROVAL OF OPERATING
PROCEDURES

On the above date Mr. Sepp was contacted to discuss WEC's March 18, 2004, letter signed by Karen Craig. The letter requested modifications to the current Chapter 2. Mr. Sepp was advised that we would prefer to refer to this change as a request to modify the license and to ask that the change be reviewed along with the Hematite Security Plan.

Mr. Sepp was requested to look at the below review comments, and get back with me as soon as possible if he or his staff have any questions. I advised him also that Mr. Kouhestani had reviewed and commented on the attachment.

REVIEW COMMENTS

1. Please rescind your 3/18 letter and submit two new letters as follows. One is a revised letter to Amir, with the attachment regarding procedures and contractors. Make the attachment to your letter a separate commitment to your license specific to the inspection. It should be made clear that this information is to be incorporated to address procedure issues identified during the inspection. Take out the references to Chapter 2. CC me and send me the revised letter and information in an electronic format.

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In a second letter submit your license chapter 2 application and your amend request regarding current license's chapter 2.

3. Additionally, Please address the following questions relating to WEC's procedures and WEC - contractor(s) procedure approval request. I have excerpted certain portions which I either need to have clarified or changed.

A. Procedures

"Policy documents are for (1) assigning responsibilities for requirements to individual positions and (2) providing upper level requirements of the project."

It appears you are adding an area of discussion which defines things which will be addressed by Amir during the review of your new Chapter 2 (to be submitted by the end of March) and the up-coming DP. As mentioned during previous reviews the material inferred in the above statement is what you will need to discuss in your future submissions.

Take out this reference and make your revision specific to procedures only.

- B. "In the absence of these specified approvals, another designated individual may provide approval."

This issue has been raised before during reviews of other amendment requests. You need to bound and define designees. You also need to define and limit absences of key positions.

For present take out the designee, and add others who are obviously qualified. You can expand or ask for variance when you submit your revised Chapter 2 for Amir.

- C. "A review procedure has been established for changes in processes, equipment and/or facilities prior to implementation."

Provide a copy of this procedure.

- D. "Environment, Health and Safety authorization must be obtained for each change involving nuclear safety or radiological safety. Environment, Health and Safety reviews shall be documented, except for minor changes within existing safety parameters."

Take out minor. This would need to be defined and bounded. This can be done during a later amendment review and DP by Amir.

- E. "The RSO and Manager Environment, Health and Safety have the authority to determine whether other cognizant individuals, such as the Nuclear Criticality Specialist and/or the Health Physicist, have the appropriate experience and expertise to provide approvals in the stead of the RSO and Manager Environment, Health and Safety for their areas of expertise. If so determined, approval authority can be delegated."

Commit to adding Project Director sign-off, and that education, training and experience will be equivalent to present license requirements and meet industry norms.

- F. "Changes to policies and procedures can be made by Hematite without prior NRC review and approval provided that the change does not conflict with license requirements nor does it prevent the compliance of applicable NRC regulations. Any changes to policies and procedures cannot degrade the safety or environmental commitments of the license, as determined by the Manager Environment, Health and Safety. Changes to policies and procedures are required to undergo the same level of approval as specified in this section of the license. Review of changes should ensure continued compliance with license and regulatory commitments. Monitoring of changes to policies and procedures shall be by surveillance to ensure compliance with revised procedures. The minimum frequency for review to ensure policies and procedures are current and continue to be appropriate shall be every two (2) years. Updating of policies and procedures is the responsibility of the document owner."

Take out the reference to policy. What are the surveillance, by who, documentation? Surveillance are not discussed in current license.

Also, indicate that the revision of this section is specific to the modification and updating of procedures previously approved at the time of Amendment 42. Any new operations or practices outside that envelop will need to be reviewed as part of the subsequent amendment and DP that Amir will look at.

- G. Plant Modification

You have taken too much out of this section, and have reduced the scope too much. Restore. You can address this with your later amendment and DP.

H. Contractor Support

"The D&D Project Manager is responsible for determining reviews of contractor documents. The following minimums are established for reviews:

- Activities involving radiological protection require the review of the Hematite RSO, or designee.
- Activities that concern Environmental Health and Safety require the review of the Manager Environment, Health and Safety, or designee.
- Waste management activities require the review of the Hematite RSO, or designee.
- Activities that affect material control and accountability are required to be reviewed by the Manager Environment, Health and Safety, or designee.
- Any activities involving SNM need to be bounded by Nuclear Criticality Safety Analyses."

Take out designees, and add another sign-off, i.e., the D&D Project Manager. You have reduced the overall sign-off envelop from current license commitment.

"Acceptance of contractor documents means that the contractor documents are in compliance with SNM-33, Hematite policies and applicable regulations. Westinghouse Hematite personnel shall perform oversight of the contractors' operations to ensure compliance with SNM-33, Hematite policies, applicable regulations and the contractor requirements. Oversight shall be performed in the following areas: operations, health physics and environment health and safety."

Since we don't have your policies as part of a license commitment or condition, change your commitment to insure that contractor work procedures are equivalent to a comparable Westinghouse procedure.

I. Contractor Support

"Site-specific training shall be provided to contractors in accordance with the provisions of Section 2.5 of this license; however, **appropriate indoctrination training may be accepted from outside organizations upon approval of their training program by the RSO for nuclear criticality, fundamentals of radiation and radioactivity, contamination control and ALARA practices. The Manager, Environment, Health and Safety is responsible for approving contractor training for safety and emergency. The RSO and Manager Environment, Health and Safety can designate this approval to qualified individuals.** "

Take out all the bolded after license. Training will be addressed by Amir during his review of your revised Chapter 2 and DP.

Mr. Hank Sepp, D&D Project Director
Westinghouse Electric Company

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Mr. Sepp was advised that I would e-mail both him and Karen Craig this e-mail. I advised him I could get his amendment out if acceptable within 1-2 days after receipt, and review.

No further discussion.

George M. McCann 03/23/04

George M. McCann

✓

cc

Chris Miller, Chief, Decommissioning Branch (e-mail)

Amir Kouhestani, DWM (e-mail)

Karen Craig, Licencing Manager WEC (e-mail)

Joe Nardi, WEC Supervisory Engineer (e-mail)