



Westinghouse

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Our ref: LTR-RAC-05-84

November 11, 2005

SUBJECT: REPLY TO A NOTICE OF VIOLATION  
REFERENCE: REPORT NO: 70-1151/2005-008

Pursuant to the provisions of 10 CFR 2.201, Westinghouse Electric Company herein provides formal response to your letter of October 11, 2005, regarding your inspection of the Columbia Fuel Fabrication Facility conducted during the period of September 12-16, 2005.

Appendix A provides a response to the violation of NRC requirements specified in the Notice of Violation.

I hereby affirm that the statements made in this response are true and correct to the best of my knowledge and belief. Should you have any questions or require additional information, please telephone Dr. Samuel G. McDonald of my Staff at (803) 647-3451.

Sincerely,

WESTINGHOUSE ELECTRIC COMPANY

Mark W. Fecteau, Manager  
Columbia Fuel Fabrication Facility

Attachments: Appendix A

cc: U. S. Nuclear Regulatory Commission  
Regional Administrator, Region II  
Sam Nunn Atlanta Federal Center  
61 Forsyth Street, SW, Suite 23T85  
Atlanta, Georgia 30303-8931

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**APPENDIX A****WESTINGHOUSE RESPONSE TO NOTICE OF VIOLATION**

**A.1** The following information is provided in response to Violation VIO 70-1151/2005-08-01 for failure to perform weekly operational function tests on eye wash and safety shower equipment.

**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**

An investigation was performed and determined that the reason for the procedural violation was less than adequate management oversight of the Emergency Shower and Eyewash program. Performance of the weekly tests was not being reinforced by first line supervision or by area management. In addition, our formal Corrective Action Program had identified isolated examples of programmatic issues but failed to identify and correct the plantwide extent of condition.

**A.1.c CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED**

The Environment, Health and Safety (EH&S) Department Manager immediately notified area management to assess emergency shower and eyewash stations in their respective areas and to perform weekly inspections per procedure SYP-215, "Emergency Shower and Eyewash Inspection and Operation" using existing documentation techniques.

In addition, the EH&S Department Manager immediately directed a formal EH&S program audit to determine the extent of condition for this emergency shower and eyewash station procedural violation. The results of this audit corroborated the NRC's findings. In most instances, eyewash and shower equipment were being inspected but not on a weekly basis. In a few isolated cases, documentation could not be verified. This audit report, EHS-05-19, is documented by LTR-EHS-05-373, dated October 14, 2005.

In concert with the aforementioned audit, EH&S personnel physically activated the equipment, and all were operational as designed.

**A.1.d ACTIONS TO PREVENT RECURRENCE**

The safety shower and emergency eyewash station inspection/operational testing program was re-designed to "prompt" operators to perform these required weekly inspections. That is, our computerized Maintenance Planning and Control system (MAPCON) now generates a weekly Operator Maintenance (OM) work order to all safety shower and eyewash location areas. Once all

safety shower and eyewash equipment work is accomplished, these completed and signed-off work orders are input into MAPCON; demonstrating formal documentation and objective evidence of inspection and operational testing.

In addition, procedure SYP-215 was revised to specify the use of these OM work orders. Other changes were made to the procedure to define the Area Manager, Team Manager and EH&S responsibilities for the Emergency Shower and Eyewash Program. Further, the frequency of weekly inspection and operational testing was emphasized, and a programmatic improvement was implemented to require an annual preventive maintenance inspection, independent of area weekly inspections. The revised procedure is completed and will be released by November 17, 2005.

Finally, EH&S is conducting weekly formal audits until there is a high degree of confidence to demonstrate compliance. After this, compliance inspections or audits will be incorporated into the EH&S Quality Assurance Program to assess the CFFF safety shower and emergency eyewash equipment inspection and operational testing program.

**A.1.c DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED**

Full compliance was achieved October 28, 2005, when all areas resumed performance and documentation of weekly functional tests on eyewash and safety shower equipment per procedure SYP-215.