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R2-B28

Westinghouse  
Electric Corporation

Commercial Nuclear  
Fuel Division

Drawer R  
Columbia South Carolina 29250  
(803) 776 2610

April 16, 1993

U.S. Nuclear Regulatory Commission  
Attn: Mr. Dan Jones  
101 Marietta Street NW, Suite 2900  
Atlanta, Georgia 30323

Dear Mr. Jones:

RE: SNM 1107

Enclosed you will find a copy of our response to the South Carolina Department of Health and Environmental Control regarding an NPDES Notice of Violation relating to a Laboratory Certification Inspection conducted on March 23, 1993.

The non-compliance situation originated from a failure to be certified for the Dissolved Oxygen analytical parameter. We have initiated efforts to become fully certified for this parameter.

Should you have any questions regarding this issue, please contact me at (803) 776-2610, Extension 3671.

Sincerely,  
WESTINGHOUSE ELECTRIC CORPORATION

*Roger E. Fischer*

Roger E. Fischer  
Senior Engineer



The Westinghouse Commercial Nuclear Fuel Division — Winner of the 1988 Malcolm Baldrige National Quality Award.

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April 14, 1993

Mr. J. Robin Foy, SC-DHEC  
Environmental Quality Manager  
Water Quality Assessment and  
Enforcement Division  
2600 Bull Street  
Columbia, South Carolina 29201

Dear Mr. Foy:

RE: NPDES Permit #SC0001848  
Correspondence 4/9/93

Westinghouse Electric Corporation Commercial Nuclear Fuel Division submits the following in response to your letter dated April 7, 1993.

(a) Reasons for Non-compliance

As an industrial wastewater analytical laboratory, we respond only to our own SC-DHEC required parameter analyses to maintain our NPDES permit compliance. Certain analyses are sent out to a qualified vendor lab. We incorrectly perceived from the March 1990 SC-DHEC Laboratory Certification inspection that we were approved for the dissolved oxygen parameter analysis. We began measurement of the dissolved oxygen parameter using a procedure derived from the EPA procedures manual under the direction of a graduate chemist and our laboratory director. At no time was there any intent to analyze unapproved parameters. The failure to gain SC-DHEC laboratory certification approval was inadvertent due to lack of familiarity with the regulation.

(b) Corrective Measures

We are immediately preparing an application for certification with the SC-DHEC Laboratory Certification Section. The dissolved oxygen procedure was reviewed during the recent lab inspection and found to be acceptable with minor corrections. We regret this misunderstanding and now fully understand the regulations regarding our limited certification.

Should you have any further concerns regarding this issue please contact Mr. Wilbur Goodwin, Manager of Regulatory Affairs at (803) 776-2610, Extension 3282.

*E. J. Kellm for J. A. Fici*

Mr. James A. Fici, Manager  
Columbia Plant



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