

R2/D1-18

April 2, 1998

*contains evaluation
of security /
safeguards*

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

SUBJECT: NRC PERFORMANCE REVIEW OF LICENSED ACTIVITIES

Dear Mr. Allen:

During February and March 1998, managers and staff in Region II and the Office of Nuclear Material Safety and Safeguards (NMSS) reviewed your program for conducting NRC licensed activities. The review evaluated your performance for the period January 1, 1996, through January 31, 1998, with a focus on the last eight months of the period. This review provides you with feedback on how NRC senior management assesses your performance, and will be used as a basis for establishing the NRC inspection program for your conduct of licensed activities during the next year.

Your performance was evaluated in the five major areas of safety operations, safeguards, radiological controls, facility support, and licensing activities. An outline of the results of the NRC's review, in the form of strengths, areas needing improvement, and challenges, is enclosed. The results of the review will be discussed with you at the Westinghouse Columbia Plant during an open meeting on April 16, 1998. During that meeting, we expect you to discuss your view of your performance in the same major areas.

Program strengths were identified during the review, particularly in the areas of worker safety training and the overall reduction in worker exposures to radioactivity. Our review also found several significant areas needing improvement. In particular, our review suggests that your management control program needs to strengthen development and implementation of procedures, surveillances, audits, and self-assessments to assure plant activities are in compliance with conditions of your license, including the fundamental controls associated with the licensed safety basis for your facility. We identified as key challenges the establishing and maintaining of a thoroughly documented safety basis, assurance that management expectations are being met by workers, and ensuring the quality of safety programs despite staffing cuts.

During our review of your licensing activities we recognized your effort in revising the Fundamental Nuclear Material Control Plan to enhance its effectiveness. We also have noted a recent improvement in communications with NRC relative to reporting of operational events.

Based upon the review, the NRC has decided to generally maintain our current level of inspection effort. Increased inspection effort in the areas of nuclear criticality safety and management controls will be offset by decreases in the areas of radiation protection and waste management. We will also place emphasis on your actions to improve the Emergency Preparedness Program.

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

Should you have any questions or comments, I would be pleased to discuss them with you.

Sincerely,

Luis A. Reyes
Regional Administrator

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

Enclosure: Licensee Performance
Review - Summary Outline

cc w/encl:
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Westinghouse Electric Corporation
Commercial Nuclear Fuel Division
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**LICENSEE PERFORMANCE REVIEW FOR WESTINGHOUSE
ELECTRIC COMPANY
ASSESSMENT PERIOD: January 1, 1996 - January 31, 1998**

**A. 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 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

Enclosure

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

C. 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

D. 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.
- Ensuring 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

E. 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