

R2/E27



Westinghouse
Electric Company LLC

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Columbia, SC 29205
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January 31, 2000
NRC-00-04

Director
Office of Nuclear Material Safety and Safeguards
U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

Dear Sir:

SUBJECT: CHANGED PAGES; LICENSE NUMBER SNM-1107; DOCKET 70-1151

Westinghouse Electric Company hereby submits (six copies of) a proposed change to Revision 16.0 of page v and pages from Chapters 1.0, 2.0, 3.0, 4.0, 6.0, 10.0 and 11.0 of the Application for Renewal of a Special Nuclear Materials License for the Commercial Nuclear Fuel Division operations at the Columbia, South Carolina Fuel Fabrication Facility. The original request for Revision 16.0 was submitted August 16, 1999. Changes to pages for the original request are identified by a single marginal line; changes to pages for this update are identified by a double marginal line. The substance of the changes correct a typographical error in possession limits, updates the Integrated Safety Assessment commitment, replaces the table of plant systems and (nuclear criticality safety) parametric controls, and incorporates NRC Inspector suggestions for clarification of employee training and liquid waste treatment commitments. The changes also update the organization structure, and incorporate other minor administrative revisions.

If you have any questions, please contact me at (803) 776-2610, Extension 3393.

Sincerely,

WESTINGHOUSE ELECTRIC COMPANY

Robert A. Williams
Licensing Coordinator

Docket 70-1151
License SNM-1107

cc: U. S. Nuclear Regulatory Commission
ATTN: Mr. Harry Felsher
Licensing Section 1, Licensing Branch
FCS&S Division, NMSS
11545 Rockville Pike
Mail Stop T8D14
Rockville, MD 20852-2738

Information in this record was deleted
in accordance with the Freedom of Information
Act, exemptions 4
FOIA 2006-0026

Enclosures

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Back-up information for the Chapter 4.0 and 6.0 proposals

Chapter 4.0

Westinghouse has made substantial progress toward meeting the existing license commitment for completion of the Columbia Fuel Fabrication Facility (CFFF) Integrated Safety Assessment (ISA). Some salient features include: (1) Completion of 13 "Enhanced Criticality Safety Evaluations (CSEs)" for SNM Operations (in accordance with License Condition S-2); and, submittal of their summaries, in the form of CSE License Annexes for docketing and NRC Staff Review; (2) Completion of 6 ISAs for SNM Operations (including the 4 plant systems identified as "high risk" by NRC Staff); and, submittal of their summaries, in the form of ISA License Annexes for docketing and NRC Staff Review; (3) Development and initiation of a structured process for placing all ISA-identified safety-significant controls under robust systems for quality assurance and maintenance; and, (4) Development, and implementation, of a structured system for relative "risk ranking" of 1 ISA and the 13 "Enhanced CSEs".

It is notable that major elements of features (3) and (4) were intended to be completed in the 2000-2002 time frame under the existing license commitment. The major reasons for the request for commitment change are (1) to enable placing ISA-identified safety-significant controls under robust systems for quality assurance and maintenance in a more timely manner; and, providing a single, specific date (December 31, 2002) for completion of the total CFFF ISA project.

In deference to the intermediate milestone identified in the existing license commitment, "by December 31, 2000, tables of Environmental/Radiological and Chemical/Fire controls will be added to the blank sections titled "Environmental Protection and Radiation Safety Controls" and "Chemical Safety and Fire Safety Controls" in the Enhanced CSE Annexes submitted in accordance with License Condition S-2 - - thus upgrading them to ISA Annexes." Westinghouse requests that the prior language in quotes be used as a License Condition of SNM-1107.

Chapter 6.0

Under separate cover, this date, a summary of plant systems and parametric controls, including the explanatory text removed from Chapter 6.0 in this proposal, was submitted for docketing (70-1151) as a Criticality Safety Evaluation License Annex. This was necessary to prevent having two conflicting summaries in effect while Revision 17.0 (major change to the Nuclear Criticality Safety Chapter) of SNM-1107 is under NRC Staff review for approval.

		Chapter 5.0 (5.11).	To clarify commitment to respiratory protection.
		Chapter 8.0 (8.9).	To update pre-fire plan preparation to current practice.
15.0	12FEB99	Table of Contents (v) Chapter 1.0 (1.4)	To clarify material possession limits.
16.0	28 JAN00	Table of Contents (v) Chapter 1.0 (1.4, 1.5, 1.9, 1.10, 1.12). Chapter 2.0 (2.0, 2.1) Chapter 3.0, (3.11, 3.12) Chapter 4.0 (4.2) Chapter 6.0 (6.4-6.12) Chapter 10.0 (10.0, 10.1) Chapter 11.0 (11.2)	To update organization structure and incorporate administrative revisions. To update the Integrated Safety Assessment Commitment. To replace the criticality Safety Controls Summary table. To correct typographical error and clarify employee training and liquid waste treatment commitments.

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to no greater than 5.0 weight-percent, in any chemical or physical form except metal; (4) [] of Pu-238/239 as sealed sources; and, (5) Transuranics and fission products in feedstock, not to exceed 3,300 Bq Alpha / KgU or 440,000 Mev Bq Gamma / KgU (i.e., the limits on alpha and gamma activity specified for "enriched reprocessed UF₆" in ASTM C996-96 "Standard Specification for Uranium Hexafluoride Enriched to Less Than 5% ²³⁵U") - not to exceed a total mass of [] of Plutonium.

Ex.
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(b.2) Material constraints -- The procurement of Special Nuclear Materials will be in accordance with licensed activity needs. Production, utilization, and/or significant loss of special nuclear materials will not be authorized. Transfers of Special Nuclear Materials will be only as arranged with facilities authorized to receive and possess such materials.

1.2 INSTITUTIONAL INFORMATION

This application requests a ten year renewal of License SNM-1107, Docket 70-1151, which authorizes the receipt, possession, storage, use, and transfer of Special Nuclear Material at the Westinghouse Electric Company's Columbia Fuel Fabrication Facility (CFFF). Westinghouse Electric Company LLC is controlled and owned by British Nuclear Fuels plc (BNFL). In accordance with the requirements of 10 CFR 70.22(a)(1), the following additional information is submitted:

1.2.1 APPLICANT AND STATE OF INCORPORATION

Westinghouse Electric Company LLC
Delaware

1.2.2 LOCATION OF THE PRINCIPAL OFFICE

Monroeville, Pennsylvania

1.2.3 NAMES (CITIZENSHIP) AND ADDRESSES OF PRINCIPAL OFFICERS

Charles W. Pryor (USA)
President and Chief Executive Officer
Westinghouse Electric Company
Westinghouse Energy Center
P. O. Box 355
Pittsburgh, Pennsylvania 15230-0355

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James A. Fici (USA)
Senior Vice President, Westinghouse
Nuclear Fuel Business Unit
Westinghouse Columbia Plant
P. O. Drawer R
Columbia, South Carolina 29250

Jack B. Allen (USA)
Vice President, U. S. Manufacturing
Westinghouse Columbia Plant
Drawer R
Columbia, South Carolina 29250

Jack B. Allen (USA)
Acting CFFF Plant Manager
Westinghouse Columbia Plant
Drawer R
Columbia, South Carolina 29250

1.2.4 CORPORATE CONTACT FOR LICENSING MATTERS

Griff Holmes
Manager, Environmental Health and Safety
Westinghouse Energy Center
P. O. Box 355
Pittsburgh, Pennsylvania 15230-0355

1.2.5 SITE CONTACT FOR LICENSING MATTERS

Robert A. Williams
Licensing Project Manager
Westinghouse Columbia Plant
Drawer R
Columbia, South Carolina 29250

1.2.6 ADDITIONAL INFORMATION

Additional corporate financial and business information is provided in the Westinghouse Annual Report, available from:

Westinghouse Electric Company
P. O. Box 355
Pittsburgh, Pennsylvania 15230-0355

1.3 SITE DESCRIPTION

The Columbia Fuel Fabrication Facility (CFFF) is located near Columbia, South Carolina and is situated on an approximately 1,158 acre site in Richland County, some 8 miles southeast of the city limits of Columbia (see Figures 1.1 and 1.2) along South Carolina

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withheld
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RADIATION WORKER—Any individual who, in the course of employment, is likely to receive an annual occupational dose in excess of 100-millirems.

REGULATORY-SIGNIFICANT PROCEDURES — Those procedures that contain, in whole or in part, actions that are important to environmental protection, health, safety, and/or safeguards.

RESTRICTED AREA — Areas such as the Manufacturing Building, or equivalent areas, to which access is restricted by physical or administrative methods and which is monitored on a scheduled basis by the site Security Function.

SAFETY MARGIN IMPROVEMENT CONTROLS — Controls that provide cost effective enhancements to the safe and effective operation of a process. These are controls that enhance an existing and adequate margin of safety.

SAFE MASS [3.7.3(b.2) and (c.5)] critical mass for a particular process or vessel given the credible material geometry for that process/vessel, and the License Evaluation Bounding Assumptions for that material type (e.g., homogeneous UO_2) and reflection. Optimum moderation and material density are assumed.

SAFETY-RELATED — Relevant to systems crucial or important to safety; and, those systems that improve the margin of safety (e.g., in the context of maintenance).

SAFETY-RELATED CONTROLS - Preventive and mitigative controls relied upon for environmental protection, radiation safety, nuclear criticality safety and safeguards, chemical safety, and fire safety. These controls, which include both "Safety-Significant" and "Safety Margin Improvement" controls as sub-sets, will be identified through an integrated safety analysis which documents the design safety basis for a particular process.

SAFETY-SIGNIFICANT — Relevant to systems crucial or important to safety (e.g., in the context of quality assurance).

SAFETY-SIGNIFICANT CONTROLS — Controls crucial or important to, or deemed desirable for, the safe and effective operation of a process, and an adequate safety margin for the process. An adequate safety margin is made up of those controls necessary for the safe operation of the process plus those controls identified to ensure regulatory compliance.

UNRESTRICTED AREA — An area, access to which is neither limited nor controlled.

WILL — Denotes a mandatory requirement to take a stated action or course.

CHAPTER 2.0

MANAGEMENT ORGANIZATION

2.1 ORGANIZATIONAL RESPONSIBILITIES AND AUTHORITIES

The Westinghouse Electric Company is divided into business units. One such business unit is the Nuclear Fuel Business Unit (CNFD), which encompasses commercial activities directly related to the development, manufacturing, and marketing of products contributing to the use of nuclear reactors for electrical power generation.

2.1.1 ORGANIZATIONAL OPERATING UNITS

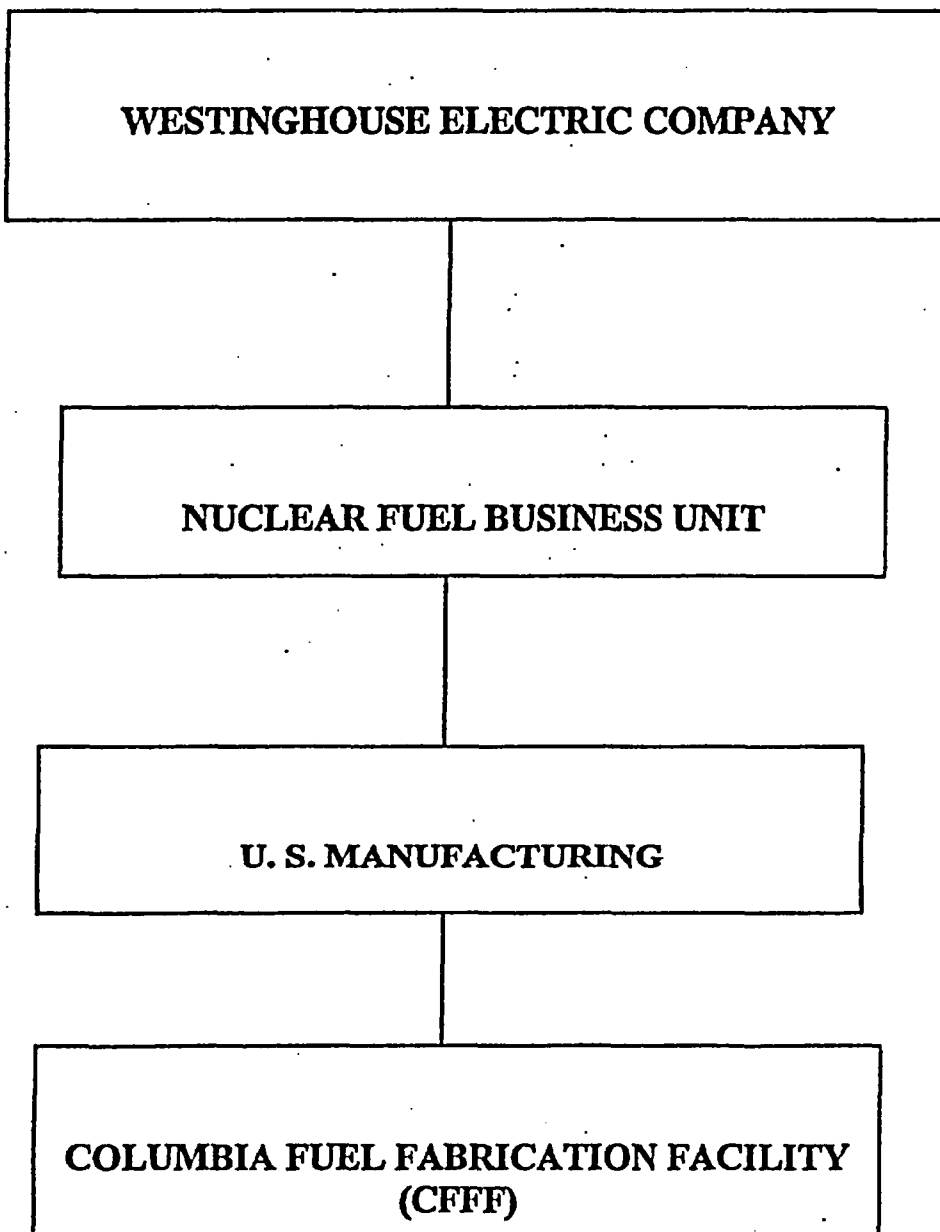
Within Westinghouse Nuclear Fuel Business Unit (NFBU), the primary domestic responsibility for the design, development, and manufacture of commercial nuclear reactor fuel rests with U. S. Manufacturing. The Vice President of U. S. Manufacturing reports directly to the Senior Vice-President of the NFBU. Within U. S. Manufacturing, the primary responsibility for all commercial nuclear reactor fuel manufacturing activities rests with the Columbia Fuel Fabrication Facility (CFFF); the CFFF Plant Manager reports to the Vice President of U. S. Manufacturing. Figure 2-1 illustrates the general structure of the Corporate organization.

The ultimate responsibility for all CFFF activities associated with the manufacture of commercial nuclear reactor fuel — including environmental protection, health, safety, quality, and safeguards — rests with the Plant Manager. The site organization consists of several staff Components reporting directly to the Plant Manager. One of these Components, Regulatory, has the responsibility for overall coordination and implementation of the Columbia Plant environmental protection, health, safety, and safeguards programs. Figure 2-2 illustrates the general structure of the CFFF organization.

2.1.2 POSITIONS AND ACTIVITIES WITHIN ORGANIZATIONAL OPERATING UNITS

Each Westinghouse management position is covered by a written description, presenting in detail its scope, purpose, duties, responsibilities, difficulties, and requirements. The description identifies the incumbent's authority for decisions which may be made unilaterally, and those requiring higher management approval. It delineates relationships with other functions, and specifies responsibilities for managing personnel, and for the control and maintenance of managed facilities and equipment. Position descriptions are reviewed and approved by two higher levels of line management. A Management

**FIGURE 2-1
COMPANY ORGANIZATION**



- Annual, for Category-1 and Category-2 Procedures; and,
- Biennial for Category-3 Procedures.

(d) Procedure Compliance

A formal system will be maintained to enable employees to report inadequate procedures, and/or inability to follow procedures, to their First Level Managers for follow-up action.

First Level Managers will enable, and require, compliance with all regulatory-significant procedures. This will be accomplished by providing ready employee access to procedures, requiring documented employee procedure review and acknowledgement, then evaluating employee performance with respect to procedure compliance on a continuing basis. Employees will receive additional instruction, if determined necessary by the First Level Manager evaluations; and, if procedures are deliberately or repeatedly violated, disciplinary action will be taken in accordance with established Westinghouse policies.

3.4.2 TRAINING AND QUALIFICATION

Training will be provided for every individual in the Columbia Fuel Fabrication Facility (CFFF), commensurate with their duties. Formal training programs will be developed and implemented to enhance and augment procedure review and acknowledgment described in Paragraph 3.4.1(d) of this Chapter, and training responsibilities described in Chapter 2.0 of this License Application. Such training programs will be performance-based; and as such, will incorporate the structured elements of job and task analysis, learning objectives, instructional methodology, implementation, and evaluation and feedback. In addition, training of Nuclear Criticality Safety Function Engineers will include qualification by cognizant Regulatory Component Management that goes beyond the position requirements described in Chapter 2.0 of this License Application. The programs will be structured such that specified training and qualification requirements will be met prior to safety-significant positions being fully assumed, or covered tasks being independently performed. Training records will be maintained in accordance with Section 3.8 of this Chapter.

(a) General, Topical, and Refresher Training

All new employees will receive training in emergency response policies and guidelines, and general safety and regulatory practices. All new employees designated as radiation workers will receive additional training relative to safety aspects concerning radiation and radioactive materials; risks involved in receiving low level radiation exposure; basic criteria and practices for radiation protection,

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nuclear criticality safety (based upon selected guidance from ANSI/ANS-8.20-1991, facility operating experience, and area specific requirements), chemical and fire safety, maintaining radiation exposures and radioactivity in effluents As Low As Reasonably Achievable (ALARA), and material safeguards. Facility visitors will be provided with training commensurate with their visit's scope; and/or, will be escorted by trained employees.

Employees or visitors for whom respiratory protection devices might be required, within the scope of their work, will receive pre-work training in the proper use of such devices.

Employees designated to take part in emergency response to facility accidents or incidents will receive training commensurate with their assigned activities during such response.

Radiation workers will receive regulatory refresher training on a biennial basis. This training will consist of:

- Providing each employee with a current revision of the Integrated Safety Training Manual;
- Presenting each employee supplementary electronic instruction on general regulatory issues; and,
- Requiring each employee to successfully pass an examination.

The Training Manual will include such subjects as:

- ALARA;
- General health physics practices;
- Health physics rules and recommendations;
- Area-specific health physics practices;
- General nuclear criticality safety practices;
- Area-specific nuclear criticality safety practices;
- Industrial safety and hygiene, and fire safety, practices;
- Chemical Area work practices;
- Radiation risks;
- Emergency planning; and,
- Safeguards.

Employees who are absent from the facility during scheduled regulatory refresher training will receive such training within one month of their return to work.

(b) Training and Qualification of Nuclear Criticality Safety Function Engineers

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controls as to their (Quality Assurance) importance.

Documentation of continuing progress toward completion of the facility ISA will be maintained at the CFFF Site for Regulatory Agency review. Integrated Safety Assessments for all systems processing licensed material will be completed; ISAs for ancillary processes that might impact control over licensed material will be completed; placement of all ISA-identified controls under the appropriate level of Quality Assurance and Maintenance will be fully implemented; and, the structured classification of all systems with respect to their relative risk will be concluded -- by December 31, 2002.

As system Integrated Safety Assessments are completed, a summary in the form of a License Annex will be submitted to NRC Licensing Staff. These summaries will include (as applicable): (1) A condensed presentation of the Process Description, Process Theory, and Process Design and Equipment; (2) A listing of key Drawings and Procedures utilized in the Process Hazard Analysis; (3) A listing of Environmental Protection and Radiation Safety controls; (4) A listing of Nuclear Criticality Safety/Safeguards controls, and Fault Trees to demonstrate Double Contingency Protection; (5) A listing of Chemical Safety and Fire Safety controls; and (6) A condensed presentation, including Fault Tree, of the Consequence Basis accident analysis (where appropriate). These summaries will be maintained as current documents. Whenever CFFF regulatory management makes a decision to change the License Annex, the NRC Licensing Project Manager will be apprised of the decision via e-mail or facsimile. Subsequently, within 30-days of the appraisal, changed pages to update the License Annex will be submitted to NRC Licensing Staff.

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verifications and maintenance activities and utilize a facility computer tracking system as the mechanism for tracking problems and documenting that corrective actions have been taken.

6.2.2 METHODS OF CRITICALITY SAFETY CONTROL

The relative effectiveness or reliability of controls will be considered during the Criticality Safety Evaluation process. Passive engineered controls will be preferred over all other system controls and will be utilized when available and appropriate. Active engineered controls will be the next preferred method of control and administrative controls will be the least preferred.

(a) Passive Engineering

These will be controls which require no action or other response to be effective when called upon to ensure nuclear criticality safety. Examples of passive engineered controls include safe geometry equipment such as structurally robust cylinders.

(b) Active Engineering

These will be controls which require an external signal and/or an electronic/mechanical action/operation to occur when called upon to ensure nuclear criticality safety. An example of an active engineered control is a shutoff valve actuated by an inline detector signal.

(c) Administrative

These will be controls which rely on user intervention and do not have the same level of reliability as engineered controls and will be least preferred. While such controls may be necessary, and hence acceptable, their use will be limited to process systems which do not lend themselves to engineered controls. Administrative controls include operator actions which are taken in accordance with a written procedure, operator verification of information with the assistance of computer terminals, actions taken in response to process alarms, etc.

6.2.3 SUMMARY OF PLANT SYSTEMS & PARAMETRIC CONTROLS

A summary of plant systems and parametric controls is docketed (70-1151) as a Criticality Safety Evaluation License Annex.

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CHAPTER 10.0

ENVIRONMENTAL PROTECTION

10.1 EFFLUENT AIR TREATMENT

For operations that might result in exhausting radioactive materials to unrestricted areas, the adequacy of air effluent control will be determined by representative stack sampling to demonstrate compliance with the regulations. Sampling will be performed continuously during production operations. Samples will be collected and analyzed daily during production operations. If radioactivity in plant gaseous effluents exceeds 1,500 microcuries per calendar quarter, a report will be prepared and submitted to the NRC Staff within 30-days of the end of the quarter in which the incident occurred. This report will identify the cause for exceeding the limit, and corrective actions to reduce the release rates. The report will be submitted to NRC Headquarters Staff, with a copy to NRC Region II. Subsequently, if any parameters important to a dose assessment in the original report are found to have changed, a follow-up report will be submitted, within 30-days, which describes the changes in parameters and includes an estimate of the resultant change in dose commitment. In the event that a calculated Total Effective Dose Equivalent to any member of the public, in a calendar year, threatens to exceed 100 mREM per year, immediate steps will be taken to reduce emissions to levels that will assure compliance.

10.2 LIQUID WASTE TREATMENT FACILITIES

A liquid waste treatment facility, with sufficient capacity and capability to enable holdup, treatment, sampling, analysis, and discharge of liquid wastes in accordance with the regulations, will be provided and maintained in proper operating condition.

Control of radioactivity in the ADU process liquid effluent waste stream will be achieved by the operation of two treatment systems: (1) a continuous on-line gamma spectroscopy monitor and quarantine tank filtration system, within the chemical controlled area, and (2) an advanced wastewater treatment facility to remove uranium to levels as low as Reasonably Achievable (ALARA), outside the facility.

The first system will be installed following quarantine tanks, diversion tanks, and filtration operations. This system assures that the ADU process liquid waste effluent being discharged from the chemical controlled area to the external waste treatment facility meets discharge criteria established by plant operating procedures, nominally less than 30 ppm uranium (equivalent to 7.2 E-05 uCi/ml at a specific activity of 2.4

uCi/gU). When the liquid has been successfully scanned for discharge, it will be pumped from the inplant final pump out tank to the second system, the advanced waste water treatment facility for uranium removal external to the main plant.

This second advanced wastewater treatment system will assure that uranium in the discharges is removed from the process liquid stream to a nominal limit of less than 0.5 ppm uranium (equivalent to 1.2×10^{-6} uCi/ml at a specific activity of 2.4 uCi/gU). Established plant operating procedures will assure that NRC 10CFR20 liquid discharge limitations are met, and will implement ALARA control.

Other miscellaneous liquid waste will be filtered and sampled on a batch basis to assure uranium is effectively removed to levels which will enable conformance to ALARA goals. Quiescent settling in lagoons (East, West, North, and South) will further enable uranium removal to levels which will assure continuing compliance with 10 CFR 20.1301 and 1302 limits.

A continuous, proportional sample of liquid effluent released to the Congaree River will be collected. A 30-day composite of this sample will be analyzed for gross alpha activity, gross beta activity, and isotopic uranium content.

Any violation of the facility NPDES Permit will be reported to NRC Region II within 15-days of confirmation of the violation. If the NPDES permit conditions are revised, or if the permit is revoked, the NRC Headquarters Licensing Staff will be promptly notified.

10.3 SOLID WASTE DISPOSAL FACILITIES

Solid waste disposal facilities, with sufficient capability to enable preparation, packaging, and transfers to licensed disposal sites in accordance with the regulations, will be provided and maintained in proper operating condition.

10.4 PROGRAM DOCUMENTATION

The licensed activity prepared an Environmental Evaluation Report dated March 1975, that has been subsequently updated in revisions dated April 1983 and April 1990. Future Environmental Impact Appraisal updates will be prepared and submitted to the NRC Licensing Staff on a schedule contingent upon the operating term of the license. For a 10-year license, the review will be documented in the ALARA Report (described in Chapter 5.0 of this License Application) and updating will be concurrent with each renewal application. The substance and methodology of each such update will be as agreed upon by cognizant NRC Licensing Staff and representatives of the licensed activity.

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- (a) Planning And Preparation;
- (b) Decontamination And/Or Dismantling Of Radioactive Facility Components;
- (c) Packaging, Shipping, And Disposal Of Radioactive Wastes;
- (d) Restoration Of Contaminated Areas On Facility Ground;
- (e) Final Radiation Survey; and,
- (f) Site Stabilization, Long-Term Surveillance.

The Westinghouse Electric Company has established a Decommissioning Funding Plan including the necessary Financial Assurance Mechanism in accordance with the provisions of 10CFR70.25. The latest revision to the Decommissioning Cost Estimate for License Number SNM-1107 was submitted by Westinghouse letter dated August 29, 1997. Revised financial assurance instruments to reflect the revised cost estimate were transmitted by Westinghouse letter dated July 10, 1998. These revisions were acknowledged and accepted by the NRC by letter dated July 23, 1998.

By letters dated September 28, 1998, November 16, 1998, January 18, 1999 and February 22, 1999. Westinghouse requested the transfer of License Number SNM-1107 from CBS Corporation to Westinghouse Electric Company LLC in conjunction with the sale of the assets to the nuclear and government operations business of CBS Corporation to a consortium consisting of Morrison Knudsen Corporation and BNFL USA Group, Inc. In conjunction with the transfer of the license, revised financial assurance documents were submitted to the USNRC by letter dated March 30, 1999 and further amended by letter dated May 18, 1999. These latter two submittals provide the most recent financial assurance mechanisms for the Decommissioning Funding Plan for License Number SNM-1107 of the Westinghouse Electric Company. By letter dated August 3, 1999 the USNRC accepted the revised financial assurance documents.

Future updates of the decommissioning cost estimate and related revisions to the financial assurance mechanisms, will be provided in accordance with the prevailing license conditions and /or regulator directives.

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