



BWX Technologies, Inc.

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July 10, 2015
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4/17/2015
8 FR 21274

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Ms. Cindy Bladey
Office of Administration
Mailstop: OWFN-12-H08
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

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- References:
- (1) NEI Letter Dated July 1, 2015 from Janet Schlueter (NEI) to Cindy Bladey (NRC)
 - (2) Supplemental Backfit Information on Guidance for Evaluation of Acute Chemical Exposures and Proposed Quantitative Standards (80 FR 21274) [Docket NRC-2015-0044]
 - (3) Letter Dated February 23, 2010, Reyes (NRC) to NOG (B&W) Notice of Violation and Proposed Imposition of Civil Penalty - \$32,500 (NRC Inspection Report No. 70-27/2008-002) (EA-08-204)
 - (4) Letter Dated September 20, 2010, Joint Motion to Approve Settlement Agreement and Terminate Proceeding, ASLBP No. 10-902-EA-BD01 (EA-08-204, HF Incident)

Subject: Clarifications to Supplemental Backfit Information on Guidance for Evaluation of Acute Chemical Exposures and Proposed Quantitative Standards (80 FR 21274) [Docket NRC-2015-0044]

Dear Ms. Bladey,

BWX Technologies, Inc. (BWXT) fully endorses the comments submitted by the Nuclear Energy Institute (NEI) on July 1, 2015 (Reference 1) regarding the Nuclear Regulatory Commission's (NRC) supplemental backfit information associated with the draft Interim Staff Guidance (ISG) on acute chemical exposures and proposed quantitative standards.

BWXT would also like to clarify information pertaining to the 2008 chemical exposure. Table 1 of the Federal Register Notice [Docket NRC-2015-0044] (Reference 2) incorrectly states that an ocular exposure event at our facility on April 28, 2008 was of intermediate or high consequence event. During the enforcement process related to this event the NRC withdrew their Severity Level III violation cited against 70.61(c)(4) "because the chemical exposure was from hydrofluoric acid...prior to process addition to licensed material" (Reference 3). Therefore, a determination of intermediate or high consequence was not made by the NRC. This enforcement action was eventually resolved through a Joint Motion Settlement Agreement where the NRC characterized the employees' injury as "significant" (Reference 4). The final

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enforcement action for this event in part was a "violation with no severity level" with the civil penalty order withdrawn and BWXT making a settlement payment. It is important to note that the injured employee suffered no long lasting health effects from their exposure and continues to work at the BWXT facility.

If you have any questions or require additional information, please contact Tony England, Manager of Licensing and Safety Analysis, at caengland@babcock.com or 434-522-6405.

Sincerely,

A handwritten signature in black ink, appearing to read "B. Joel Burch". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

B. Joel Burch
Vice President and General Manager
BWXT Nuclear Operations Group, Inc. - Lynchburg