



**UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
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ATLANTA, GEORGIA 30303-1257**

March 2, 2018

Mr. Mike Annacone
Vice President, Columbia Fuel Operations and
Manager, Columbia Plant
Westinghouse Electric Company
5801 Bluff Road
Hopkins, SC 29061

**SUBJECT: WESTINGHOUSE ELECTRIC COMPANY, LICENSEE PERFORMANCE
REVIEW (NUCLEAR REGULATORY COMMISSION INSPECTION
REPORT 70-1151/2018-001)**

Dear Mr. Annacone:

The Nuclear Regulatory Commission (NRC) staff in our Region II office, the Office of Nuclear Material Safety and Safeguards, and the Office of Nuclear Security and Incident Response completed an annual Licensee Performance Review (LPR) of the Westinghouse Columbia Fuel Fabrication Facility (CFFF) inspection results and performance in conducting NRC licensed activities. The annual review covered the period January 1, 2017 through December 31, 2017. The performance of CFFF was evaluated in the following performance areas: Safety Operations, Safeguards, Radiological Controls, Facility Support, and Other Areas.

As a result of the NRC's review of plant performance, the Area Needing Improvement (ANI) identified in 2017, as defined in IMC 2604, "Licensee Performance Review," in the area of Safety Operations will be maintained. This area was associated with the S-1030 Scrubber event and documented in the 2017 LPR letter (ML17067A064). The NRC identified weaknesses in the area of management measures and the assumptions used in the site's criticality safety evaluations (CSEs). The ANI will continue to be in the areas of plant operations and nuclear criticality safety. In addition, the NRC will maintain the increased licensee performance review frequency at a 12-month cycle consistent with IMC 2604 until this ANI is closed.

Closure of the ANI will be dependent upon completion of all requirements described in the associated confirmatory order (CO) issued August 9, 2017 (ML17221A122), implementation of adequate corrective actions associated with management measures and criticality safety, and substantive progress of the nuclear safety culture at CFFF.

This letter is a notification to CFFF of the NRC staff's decision to adjust the 2018 core inspection effort at CFFF as follows.

- Conduct a nuclear safety culture supplemental inspection following completion of CFFF's ad-hoc nuclear safety culture (NSC) survey which is tentatively scheduled for early summer 2018. This survey is in advance of the CO requirement to conduct an

NSC survey in 2019. This time frame would allow the licensee to have generated and initiated corrective actions from their independent assessment which was completed in May 2017. The NRC's safety culture evaluation will be conducted by two inspectors and will include approximately 50-60 hours of inspection effort. Note that this inspection was previously identified and required as part of the ANI identified in the 2017 LPR letter.

- The inspection activities associated with the CO closure capture most of the additional inspection effort required for this ANI. The inspection effort will entail multiple inspections and the timeframe will be dependent upon the licensee's progress in closing all CO items. Inspector hours associated with these inspections will depend upon the implementation progress of the licensee's corrective actions.

Further adjustment to the core inspection will be determined during subsequent program adjustment reviews. The enclosure to this letter provides the results of our review and constitutes the basis for establishing the NRC oversight program for your facility. No separate letter will be sent for the Safeguards area.

The results of our review will be discussed with you at a public meeting expected to be held in May 2018. During the meeting, we request you discuss your performance in the same major areas as those evaluated by the NRC.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice and Procedure," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Please refer questions and comments regarding your licensee performance review to Mr. Eric Michel, Chief, Projects Branch 2, by telephone at 404-997-4555.

Sincerely,

/RA/

Mark S. Lesser, Director
Division of Fuel Facility Inspection

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

Enclosure:
Licensee Performance Review

cc: (See page 3)

cc:

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SUBJECT: WESTINGHOUSE ELECTRIC COMPANY, LICENSEE PERFORMANCE
REVIEW (NUCLEAR REGULATORY COMMISSION INSPECTION
REPORT 70-1151/2018-001) – MARCH 2, 2018

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**LICENSEE PERFORMANCE REVIEW FOR WESTINGHOUSE
FUEL FABRICATION FACILITY**

ASSESSMENT PERIOD: JANUARY 1, 2017 TO DECEMBER 31, 2017

The following is a summary of the performance of Westinghouse Columbia Fuel Fabrication Facility (CFFF) in the conduct of NRC-licensed activities.

PERFORMANCE AREA: SAFETY OPERATIONS

This area is comprised of plant operations, nuclear criticality safety, and fire protection.

During the Licensee Performance Review (LPR) assessment period, the following enforcement items were issued in the area of Safety Operations during calendar year 2017:

- Inspection report (IR) 70-1151/2017-007, dated February 27, 2017 (ML170058A448), documented four apparent violations (AVs) related to the S-1030 scrubber system which was inspected and documented in 70-1151/2017-007. These four AVs were resolved through the Alternate Dispute Resolution program and the issuance of a Confirmatory Order dated August 9, 2017 (ML17221A122).
- Inspection report 70-1151/2017-004, dated October 26, 2017 (ML17303A023), documented two related severity level four violations involving the S2A/2B scrubber ventilation system. The first violation was related to the failure of safety systems designed to prevent water accumulation in the downstream ductwork, defined as a failure of an Item-Relied-Upon-For-Safety (IROFS). The second violation involved the licensee's failure to properly implement management measures such that the IROFS above remained available and reliable to perform its intended safety function when needed.

Program Areas Needing Improvement

- Maintain the Area Needing Improvement (ANI) which was identified during the 2017 LPR in Safety Operations, due to a safety significant issue involving the S-1030 scrubber. The NRC identified weaknesses in the area of management measures and the assumptions used in the site's Criticality Safety Evaluations (CSEs). The ANI would be in the areas of plant operations and nuclear criticality safety.
- Closure of the ANI will be dependent upon completion of all Confirmatory Order (CO), corrective actions associated with management measures, criticality safety, and evaluation of nuclear safety culture at CFFF.

Recommended NRC Inspection Effort

- Conduct a nuclear safety culture inspection following completion of CFFF's ad-hoc nuclear safety culture (NSC) survey which is tentatively scheduled for early summer 2018. This survey is in advance of the Confirmatory Order required NSC survey in 2019. This time frame would allow the licensee to have generated and initiated corrective actions from their independent assessment which was completed in May 2017. The NRC's safety culture inspection would consist of two inspectors and will

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include approximately 50-60 hours of inspection effort. Note that this inspection was previously identified and required by the 2017 ANI.

- The inspection activities associated with the Confirmatory Order (CO) closure capture most of the additional inspection effort required for this ANI. The licensee's root cause analysis and Excellence Plan are quite extensive and the regional staff have determined that the inspection and review of these activities capture the overall weaknesses identified by the augmented inspection team (AIT). The inspection effort will entail multiple inspections and the timeframe will be dependent upon the licensee's progress in closing the CO items. Inspector hours associated with these inspections will also be dependent on the extent of the licensee's corrective actions.

PERFORMANCE AREA: RADIOLOGICAL CONTROLS

This area is comprised of radiation protection, environmental protection, waste management, and transportation.

Program Areas Needing Improvement

- No specific Area Needing Improvement was identified in Radiological Controls.

Recommended NRC Inspection Effort

- Maintain the core inspection effort in Radiological Controls.

PERFORMANCE AREA: FACILITY SUPPORT

This area is comprised of maintenance and surveillance of safety controls, management organization and controls, operator training, emergency preparedness, emergency exercise evaluation, and permanent plant modifications

Program Areas Needing Improvement

- No specific Area Needing Improvement was identified in Facility Support.

Recommended NRC Inspection Effort

- Maintain the core inspection effort in Facility Support.

PERFORMANCE AREA: SAFEGUARDS

This area is comprised of material control and accountability (MC&A), physical protection of special nuclear material, and classified material and information security.

During the Licensee Performance Review (LPR) assessment period, the following enforcement items were issued in the area of Safeguards during calendar year 2017:

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One Severity Level IV (SLIV) Violation and one non-cited violation were identified in the material control & accountability (MC&A) function area:

- VIO 07001151-2017-401-01: A SL IV Violation was identified on October 25, 2017 by the NRC.
- NCV 07001151-2017-401-02: A non-cited violation (NCV) SL IV was identified on September 1, 2017 by the licensee.

Performance Analysis for Area Needing Improvement (ANI)

- No specific Area Needing Improvement was identified in Safeguards.

Inspection Effort Recommendation

- Maintain the core inspection effort in Safeguards.