



Westinghouse Electric Company LLC
Columbia Fuel Site
5801 Bluff Road
Hopkins, South Carolina 29061-9121
USA

Director, Office of Nuclear Material Safety and
Safeguards
U. S. Nuclear Regulatory Commission
Document Control Desk
11555 Rockville Pike
Rockville, Maryland 20852-2738

Direct tel: 860-731-6734

e-mail: spaldiaj@westinghouse.com

Your ref:

Our ref: LTR-RAC-20-42

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SUBJECT: RESUBMITTAL OF WESTINGHOUSE REQUEST FOR TEMPORARY CHANGE TO
SITE EMERGENCY PLAN

Per 10 CFR 70.32(i), Westinghouse Electric Company LLC (Westinghouse) is applying for a temporary change to the Columbia Fuel Fabrication Facility (CFFF) Site Emergency Plan (SEP). The details of the temporary change request related to the SEP are described in Enclosure 1 of this letter. This letter is being resubmitted to NRC (previously submitted as LTR-RAC-20-35, ML20100G526, dated April 9, 2020), in order to make Enclosure 1 publicly available.

If you have any questions, please contact me at (860) 731-6734.

Amanda Spalding
Licensing Manager, Acting
Westinghouse Columbia Fuel Fabrication Facility
Docket 70-1151 License SNM-1107

Enclosure 1: CFFF SEP Temporary Change Request

cc:

Mr. Thomas Vukovinsky

Ms. Marilyn Diaz

Enclosure 1
CFFF SEP Temporary Change Request

Section 7.5 of Revision 20 of the CFFF SEP currently states: "Independent audits of equipment readiness and elements of the program that have had weakness identified during exercises or drills shall be performed annually." This audit was last performed on March 21, 2019. Per the SNM-1107 definition of annual, this audit must be completed within 15 months of the previous one. Due to the precautions put in place at the CFFF in response to the COVID-19 pandemic, only necessary personnel for operations are currently onsite, and visitors have been severely limited. The SEP equipment readiness audit requires completion by an independent auditor (i.e., not a CFFF employee), and cannot be completed remotely because the majority of the audit is equipment-related and requires the auditor's eyes on the equipment. As it is unknown at this time how long these precautions and site access restrictions will be needed, Westinghouse is requesting a temporary change to the CFFF SEP, to change the periodicity of completing this audit from annual to biennial. Per the SNM-1107 definition of biennial, the audit would next be performed in 2021, within 30 months of the date it was completed in 2019. After the audit is completed in 2021, the temporary change will be removed, and the periodicity of the audit will go back to annual.

Westinghouse has concluded that this temporary change does not have a negative impact to public health and safety. The last audit in 2019 led to three Suggestions for Improvement (SFIs). Westinghouse entered these items into the Corrective Action Program (CAP) and took actions to address. A summary of the SFIs and actions taken are as follows:

1. An example was found where the date associated with an inventory sheet was not clearly identified. The date was recoverable, but the importance of making sure that all relevant information, including dates, is properly documented was reinforced with all Incident Commanders (ICs)
2. A suggestion was made to ensure that drill scenarios should be realistic in order to fully benefit the participating employees. Based on an evaluation of this suggestion, the decision was made that subsequent drills have been performed as a table top exercise.
3. A suggestion was made to add the type, amount, and frequency of training to the Organizational Statement of the Westinghouse Emergency Response Organization (ERO); it was confirmed that this information is already included in the overall organizational statement. Additionally, training requirements were reviewed and confirmed that Fire Brigade leaders and training instructors receive additional and more comprehensive training than what is required for a general member of the Fire Brigade.

Since the 2019 audit, there have been no changes to the CFFF Emergency Preparedness (EP) program. Additionally, NRC recently performed an inspection of the CFFF EP program in February 2020. NRC did not identify any violations during this audit. Therefore, Westinghouse has concluded that there are no negative impacts to public health and safety related to the proposed temporary change in the CFFF SEP.