



Westinghouse
Electric Corporation

Commercial Nuclear
Fuel Division

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Columbia South Carolina 29250
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NRC-96-059

December 20, 1996

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

Gentlemen:

SUBJECT: REPLY TO A NOTICE OF VIOLATION
REFERENCE: REPORT NO: 70-1151/96-05

Pursuant to the provisions delineated in Section 2.201 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, Westinghouse herein provides formal response to your letter of November 1, 1996, regarding your inspection of the Columbia Fuel Fabrication Facility conducted during the period of October 29 - November 1, 1996.

Appendix A provides our response to the specific violation of NRC requirements identified in the Notice of Violation.

I hereby affirm that the statements made in this response are true and correct to the best of my knowledge and belief. Should you have any questions or require additional information, please telephone me at (803) 776-2610.

Sincerely,

WESTINGHOUSE ELECTRIC CORPORATION

James A. Fici, Plant Manager
Columbia Fuel Fabrication Facility

Attachments: APPENDIX A

cc: U.S. Nuclear Regulatory Commission
Regional Administrator, Region II
101 Marietta Street, NW
Atlanta, GA 30323



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PDR ADOCK 07001151
C PDR

The Westinghouse Commercial Nuclear Fuel Division — Winner of the 1988 Malcolm Baldrige National Quality Award.

APPENDIX A
WESTINGHOUSE RESPONSE TO THE ITEM OF NONCOMPLIANCE
IDENTIFIED IN THE NRC NOTICE OF VIOLATION

The information in this Appendix is provided in response to the Inspectors' observations as described in the "VIOLATION" section below:

VIOLATION

1. Contrary to License and procedure requirements, a three month PM work order for the #1 North American Boiler, Equipment N. 65973, was generated on May 11, 1995, and completed on June 21, 1995; however, the subsequent 3-month PM work order was generated on September 14, 1995 but was not completed until November 9, 1995, a time period greater than the 115-day frequency allowed.

WESTINGHOUSE RESPONSE

I. ACKNOWLEDGMENT OF THE VIOLATION

The violation is correct as stated in the Notice of Violation.

II. REASON FOR THE VIOLATION

As determined by a preventive maintenance (PM) program self-assessment on July 16, 1996, there was a lack of focus on, and inadequate assigned responsibility for, completing safety-related PM requirements in accordance with the governing procedure.

III. IMMEDIATE ACTION TAKEN AND RESULTS ACHIEVED

Effective July 16, 1996, a specific individual within the Maintenance organization was assigned responsibility to track, and report on, scheduled PM activities that threaten to exceed procedure frequency requirements. Further, a second specific individual within the Maintenance organization was assigned responsibility for closure of PM work orders, to assure accuracy and timeliness. Since these assignments, all safety-related PM work orders, to assure accuracy and timeliness. Since these assignments, all safety-related PM activities have been within the frequency prescribed by the License.

IV. ACTIONS TAKEN, OR PLANNED, TO PREVENT RECURRENCE

Beginning in 1997, the Maintenance organization will direct and/or conduct an annual formal management audit to assure continuing compliance with requirements for safety related preventive maintenance.

V. DATE WHEN FULL COMPLIANCE WAS ACHIEVED

Full compliance was achieved on July 16, 1996.