

NOTICE OF VIOLATION

Westinghouse Electric Corporation
Columbia South Carolina

Docket No. 70-1151
License No. 1107

During an NRC inspection conducted on December 16-20, 1996, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

Safety Condition S-1 of License 1107 authorizes the use of licensed materials in accordance with the statements, representations, and conditions in the License Application and Supplements.

- I. Approved License Application Section 3.b.1, Performance-Based Internal Inspections and Audits, Subsection (b), Formal Audits, states "Cognizant Regulatory Function Engineers conduct monthly formal audits of regulatory program performance. The auditors will have the technical capability, and will be formally directed by Regulatory Compliance management, to find process upsets and procedural inadequacies beyond those surfaced by simple paperwork reviews."

Contrary to the above, the monthly formal audit of the regulatory program performance conducted on December 17, 1996, under the guidance provided in RA-102, Regulatory Compliance Inspections, Revision 7, was inadequate in that process upsets and procedural inadequacies beyond those surfaced by simple paperwork reviews could not have been found since the auditor did not review procedural adequacy or ongoing process operations.

This is a Severity Level IV violation (Supplement VI).

- II. Approved License Application Section 3.6.2, Facility Management Self-Assessment, states "The Plant Manager will document CFFF policy on the purpose and objectives of self-assessment to Component Managers, including aggressive demand for quality assessment performance."

Contrary to the above, as of December 20, 1996, no written policy documented the purpose and objectives of the facility management self-assessment program.

This is a Severity Level IV violation (Supplement VI).

Enclosure 1

- III. Approved License Application Section 3.6.2 also states that "On a semi-annual basis, the following parameters will be summarized and trended by the Regulatory Component: A summary of items documented in the performance-based reporting process; ...The summaries and trends will be formally reviewed by the RCC [Regulatory Compliance Committee]..."

Contrary to the above, during 1996, the Regulatory Component did not adequately summarize and trend the items documented in the performance-based reporting system, and the RCC did not adequately review the summaries and trends. Specifically, RCC minutes for 1996 indicated that the only trending of items consisted of the total number of reports broken down by one of four general process area and did not include emerging problems, declining performance areas, or root cause analysis.

This is a Severity Level IV violation (Supplement VI).

- IV. Approved License Application Section 6.1.2, Inspections & Audits, states that "This program incorporates process, procedure, and program reviews as tools to evaluate the effectiveness of the criticality safety program. All such inspections and audits will be conducted and documented in accordance with a written procedure." It further states that "Process reviews include inspections and audits of the conduct of operations within the facility and will be conducted on an annual frequency."

Contrary to the above, between the date of license renewal and December 20, 1996, the process review inspections and audits were not conducted and documented in accordance with a written procedure in that no written procedures had been developed and/or implemented by the licensee.

This is a Severity Level IV violation (Supplement VI).

Pursuant to the provisions of 10 CFR 2.201, Westinghouse Electric Corporation is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with copies to the Regional Administrator, Region II, and Chief, Fuel Cycle Operations Branch, Division of Fuel Cycle Safety and Safeguards, NMSS, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your

response may reference or include previously docketed correspondence if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other actions as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld, and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.790(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Dated at Rockville, Maryland
this 23 day of January 1997