



Westinghouse  
Electric Corporation

Commercial Nuclear  
Fuel Division

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Columbia SC 29250  
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NRC-96-056

November 27, 1996

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

Gentlemen:

SUBJECT: REPLY TO A NOTICE OF VIOLATION  
REFERENCE: REPORT NO: 70-1151/96-03

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 September 9-26 and October 4, 1996.

Appendix A provides our response to the specific violation of NRC requirements identified in the Notice of Violation. All additional issues presented in the inspection report have been highlighted for tracking to resolution, and appropriate documentation is being completed for follow-up inspector review.

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

*J. A. Fici*

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



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

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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. The following information is provided in response to the inspector's observations that the 1995 independent audit of the emergency preparedness program was not performed as required by the Site Emergency Plan. "The licensee's audit consisted exclusive of the CY 95 exercise. No evaluations were performed within the areas of training, emergency facilities, equipment, supplies, records, or the Site Emergency Plan Implementing Procedures."

WESTINGHOUSE RESPONSE

I. ACKNOWLEDGMENT OF THE VIOLATION

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

II. REASON FOR THE VIOLATION

The violation resulted from a misunderstanding between the emergency preparedness coordinator and the independent auditor as to the required audit scope, and a failure to recognize the limited scope of the audit during review of the audit findings by the emergency preparedness coordinator.

III. IMMEDIATE ACTION TAKEN AND RESULTS ACHIEVED

The emergency preparedness coordinator immediately committed to preparing an audit checklist for the 1996 audit to assure that all applicable criteria from the Site Emergency Plan are included. The independent auditor for the 1996 audit has been selected, and the audit checklist has been prepared and sent to the auditor. The 1996 audit is scheduled for completion by December 15, 1996.

IV. ACTIONS TAKEN, OR PLANNED, TO PREVENT RECURRENCE

A Commitment Tracking System (CTS) item has been prepared to guide the emergency preparedness coordinator in defining audit scope, and assuring completeness of follow-up review, of all future audits.

V. DATE WHEN FULL COMPLIANCE WAS ACHIEVED

Since it is not possible to re-do the 1995 audit, and the 1996 audit has been structured to meet all Site Emergency Plan requirements, full compliance has been achieved.