



**Westinghouse
Electric Corporation**

NRC-97-014

April 9, 1997

U.S. NUCLEAR REGULATORY COMMISSION
ATTN: Document Control Desk
Washington, DC 20555

Commercial Nuclear Fuel Division

Drawer R
Columbia South Carolina 29250
(803) 776 2610

Gentlemen:

SUBJECT: REPLY TO A NOTICE OF VIOLATION
REFERENCE: REPORT NO: 70-1151/97-202

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 March 14, 1997, regarding your inspection of the Columbia Fuel Fabrication Facility conducted during the period of February 10-14, 1997.

Appendix A provides our response to the 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 Mr. Wilbur L. Goodwin of my Staff at (803) 776-2610 Ext. 3282.

Sincerely,

WESTINGHOUSE ELECTRIC CORPORATION

James A. Fici, Plant Manager
Columbia Fuel Fabrication Facility

Attachments: Appendix A

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

IEDT/1

9704150217 970409
PDR ADOCK 07001151
C PDR

150116



APPENDIX A

WESTINGHOUSE RESPONSE TO NOTICE OF VIOLATION

- A. The following information is provided in response to the Inspector's observation that "...Emergency Procedures issued by the licensee were not approved by cognizant Regulatory Component Manager until after they had been issued and implemented."

A.1 ACKNOWLEDGEMENT OF THE VIOLATION

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

A.2 REASON FOR THE VIOLATION

The violation resulted from the cognizant engineer's referral to, and misinterpretation of, documentation pertaining to a previous Emergency Procedures issuance instead of properly referring to the applicable license commitment.

A.3 IMMEDIATE ACTION TAKEN AND RESULTS ACHIEVED

The cognizant individual responsible for coordinating the Emergency Response Program was re-instructed that Emergency Procedures are Category-1 or Category-2 procedures in accordance with Section 3.4.1 of License SNM-1107. For the February 27, 1997 revision of Emergency Procedures, the appropriate management approvals were obtained prior to issuance.

A.4 ACTIONS TO PREVENT RECURRENCE

The immediate actions taken will also serve to prevent recurrence. All future revisions to Emergency Procedures will be approved by cognizant Regulatory Component Management before they are issued and implemented.

A.5 DATE WHEN FULL COMPLIANCE WAS ACHIEVED

Full compliance was achieved on February 27, 1997.