



**Westinghouse
Electric Corporation**

NRC-97-001
March 21, 1997

Commercial Nuclear Fuel Division

Drawer R
Columbia South Carolina 29250
(803) 776 2610

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

Gentlemen:

SUBJECT: REPLY TO A NOTICE OF VIOLATION
REFERENCE: REPORT NO: 70-1151/96-204

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 January 23, 1997, regarding your inspection of the Columbia Fuel Fabrication Facility conducted during the period of December 16-20, 1996.

Per agreement with Mr. Philip Ting (NRC letter dated February 27, 1997), the due date for this response was extended to March 24, 1997, for the reasons enumerated therein.

Appendix A provides our responses to the apparent violations of NRC requirements identified in the Notice of Violation. Appendix B provides information regarding the statement in your letter regarding a mechanism for implementation of license requirements.

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

James A. Fici, Plant Manager
Columbia Fuel Fabrication Facility

Attachments: Appendix A
Appendix B

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

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PDR ADOCK 07001151
C PDR



APPENDIX A

WESTINGHOUSE RESPONSE TO NOTICE OF VIOLATION

- A. The following information is provided in response to the Inspector's observations that "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 areas and did not include emerging problems, declining performance areas, or root cause analysis".

A.1 ACKNOWLEDGEMENT OF THE VIOLATION

Westinghouse disputes the violation as stated in the Notice of Violation.

License SNM-1107 requires only that, on a semi-annual basis, "A summary of items documented in the performance-based reporting process" be formally reviewed by the RCC. Contrary to the statement of the apparent violation, the records of the RCC meetings held during 1996 indicate that this License condition was met, in that the summaries were developed and reviewed by the RCC. Moreover, in addition to the summaries review, (as required by License commitment), trend analyses of applicable items, an activity beyond the License commitment, also were performed by the RCC during 1996 as indicated below.

A.2 REASON FOR DISPUTING THE VIOLATION

Relevant data were first reported in the ALARA Report for the six month period ending December 31, 1995 in accordance with License SNM-1107, Section 3.6.2 (which was approved November 1995).

In the February 15, 1996 meeting of the RCC, a "Self-Assessments of Regulatory Performance" item was formally added to the standing agenda for the RCC. Subsequent summaries and trends were reviewed in the following RCC meetings: April 18, 1996, August 15, 1996, and November 21, 1996.

In the April 18, 1996 RCC meeting, the data included information contained in the above-referenced ALARA Report, and included the total number of items generated in five functional areas (not four as indicated in the inspection report). The information also included the total number of open items.

In the August 15, 1996 RCC meeting, the reported information included data such as number of items from the previous week for eight functional areas, total for the month, total during 1996, total items open, new Data Packs (which is an indication of the significance of the generated items), NRC notifiable incidents, and NRC courtesy calls (which are also indications of the significance of the generated items).

In the November 21, 1996 RCC meeting, the summary included the number of items since the last RCC meeting in eight functional areas, the total items generated during 1996 and the total number of open items.

In addition, formal Product & Process Improvement Teams (consisting of cognizant Engineering and Manufacturing personnel) review Redbook items at routine (approximately weekly) meetings and have identified significant issues and trends.

Therefore, we believe that the License condition was met and exceeded, in that there were summaries and trend analyses of these items (even though License SNM-1107 requires only summaries).

A.3 IMMEDIATE ACTION TAKEN AND RESULTS ACHIEVED

Following receipt of the apparent violation, the documentation of performance-based reporting items was reviewed by the RCC. As a result of this review, it was decided that the reporting process, as described in this response, provides the RCC with sufficient information for assessment of this program.

A.4 ACTIONS TO IMPROVE THE PROGRAM

The Regulatory Component and RCC will continually review the self-assessment program to ensure that it continues to meet license requirements and continues to provide the RCC with appropriate assessment information.

A.5 DATE WHEN FULL COMPLIANCE WAS ACHIEVED

Not applicable.

B. The following information is provided in response to the Inspector's observations that "as of December 20, 1996, no written policy documented the purpose and objectives of the facility management self-assessment program".

B.1 ACKNOWLEDGMENT OF THE VIOLATION

Westinghouse disputes the violation as stated in the Notice of Violation.

B.2 REASON FOR DISPUTING THE VIOLATION

During this inspection, Westinghouse Columbia Plant personnel could not locate the letter which implemented Section 3.6.2 of the license. Since then, however, the letter dated January 15, 1992 from R. H. Koga, Columbia Plant Manager at that time, has been found and is attached hereto. This letter provided comprehensive guidance to assure proper internal reporting of events and NRC notification of unusual occurrences in accordance with license criteria in Section 3.6, "Audits and Self-Assessments".

The letter also expanded the internal procedure "requiring immediate internal reporting of ALL safety-significant events involving inability to follow a procedure, or a process upset". Following the publication of this letter, comprehensive training was administered to management, supervision and operators to emphasize the importance of reporting all process upsets and inability to follow procedures. This training included attendance by all Component Managers who are currently designated as Regulatory Compliance Committee members, including the present Plant Manager (Section 2.2 of SNM-1107). Consequently, the guidance provided by the January 15, 1992 letter is as applicable today as it was in 1992.

The current Plant Manager has been and continues to be a strong proponent of comprehensive self-assessment at the Columbia Plant, as evidenced by statements in Regulatory Compliance Committee meeting minutes, and his frequent declaration of SNM-1107 (which contains strong commitments to self-assessment) as a "model" license.

B.3 IMMEDIATE ACTION TAKEN AND RESULTS ACHIEVED

To reiterate the intent of the 1992 letter, on January 17, 1997, the current Plant Manager formally reaffirmed and updated the long-standing Columbia Plant self-assessment commitment by documenting the Columbia Plant policy on the purpose and objectives of self-assessment to Component Managers, including aggressive demand for quality assessment performance (copies enclosed).

B.4 ACTIONS TO IMPROVE THE PROGRAM

On January 29, 1997, the Columbia Plant individual with principal responsibility for consolidation of the License Application completed and distributed, to cognizant Regulatory management and professional personnel, a detailed review of the Application's commitments with respect to "Audits and Self-Assessments", to assure that responsible individuals understood the commitments.

B.5 DATE WHEN FULL COMPLIANCE WAS ACHIEVED

Not applicable.

- C. The following information is provided in response to the Inspector's observations that "...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."

C.1 ACKNOWLEDGEMENT OF THE VIOLATION

Westinghouse disputes the violation as stated in the Notice of Violation.

License SNM-1107, Section 3.6.1(b), requires that "The auditors...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 observation, direction was provided, and process upsets and procedural inadequacies were found and documented as indicated below.

C.2 REASON FOR DISPUTING THE VIOLATION

Following approval of License SNM-1107 on November 3, 1995, the Regulatory Affairs Inspection Coordinator reviewed Procedure RA-102 and the formal monthly inspections practice, and compared these with the license requirements. The specific points regarding process upsets and procedural inadequacies were reviewed with the Inspection Coordinator's management and the Manager of Nuclear Materials Safety & Safeguards. Management confirmed that the inspections as they were being conducted, and as they continue to be conducted, fulfilled the letter of the license and the intent of Management. It is agreed, however, that RA-102 does not specifically use the words: "inspectors are to look for process upsets and procedural inadequacies".

Following receipt of this apparent violation, we reviewed the formal monthly inspection reports from November 1995 to January 1997. Of the approximately 100 violations observed and documented during this period, the review determined that all were, in fact, a mixture of process upsets and procedural inadequacies. These findings included all areas subject to inspection: nuclear criticality safety, radiation protection, SNM safeguards, industrial safety, and fire protection. This performance clearly shows that appropriate direction was in fact provided, and process upsets and procedural inadequacies beyond those which would surface from simple paperwork reviews were found, documented, and corrected as part of the audit process. We further submit that the intent of the

license commitment is best accomplished, not by actually taking a copy of an operating procedure onto the floor and observing an operation in progress, but by looking for evidence that a procedure was violated, that a procedure was inadequate, or that a process upset had occurred. As prescribed by license, it is the first level managers that are responsible for assuring their subordinate personnel follow procedures.

C.3 IMMEDIATE ACTION TAKEN AND RESULTS ACHIEVED

The Manager of Regulatory Affairs issued a letter dated January 24, 1997 (copy enclosed) to the Regulatory Affairs Inspection Coordinator, clarifying paragraph 3.6.1 (b) as follows:

"This simply means that, AS YOU ARE ALREADY DOING, your formal Regulatory Compliance Inspections...WILL CONSIST OF ON-THE-FLOOR TOURS, and not simply a paper review 'back in the office'."

This letter affirms the previous management evaluation of our inspection process and reiterates that the inspection process fulfills the license requirement.

C.4 ACTIONS TO IMPROVE THE PROGRAM

Procedure RA-102 will be revised to clarify the inspection policy, specifically worded to include the need to inspect for "process upsets" and "procedural inadequacies". Procedure RA-102 will be revised, approved and re-issued by May 31, 1997.

C.5 DATE WHEN FULL COMPLIANCE WAS ACHIEVED

Not applicable.

D. The following information is provided in response to the Inspector's observations that "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."

D.1 ACKNOWLEDGEMENT OF THE VIOLATION

Westinghouse disputes the violation as stated in the Notice of Violation.

License SNM-1107, Section 6.1.2, requires that process, procedure, and program reviews "...will be conducted and documented in accordance with a written procedure". Contrary to the above observation, the process reviews were conducted and documented in accordance with a written procedure as indicated below.

D.2 REASON FOR DISPUTING THE VIOLATION

In 1994, before beginning our program of zero-based Criticality Safety Evaluations (CSE's) for the Columbia Plant, a formal document was developed entitled, "Guidelines for Preparing a Criticality Safety Evaluation (Including Resource Estimates)". This document, approved by Plant Management, including the managers of Regulatory Affairs, Manufacturing and Technical Services on May 5, 1994, specifies the format and content of the CSE's for each process system. A synopsis of these "Guidelines..." is contained in Section 6.4.1(a-h) of License SNM-1107.

The schedule for preparation of the CSE's remaining to be completed after approval of License SNM-1107 is given in License Condition S-2. These process reviews are continuing on schedule, and applicable reviews will be completed by the end of 1997. These CSE's are being conducted and documented in accordance with the approved procedure described previously.

It is the expressed intent of Westinghouse Columbia Plant Management that the CSE's constitute the process reviews to which we committed in the license. Further, beyond 1997, it is our intent that the Integrated Safety Assessments (ISA's), to which we have committed in Chapter 4.0 of License SNM-1107, will constitute the process reviews for the period 1998-2000. The ISA's will also be conducted and documented in accordance with new formal guidelines, also to be approved by Plant Management.

Additional process reviews also take place on a continuing basis through two other means: (1) the Columbia Plant Configuration Control Program, governed by Procedure TA-500,

and (2) other process reviews as directed by Management (One such process review is currently underway to review our moisture control process for material designated for bulk powder blending. This process review resulted from a series of self-assessment items generated during 1996.)

D.3 IMMEDIATE ACTION TAKEN AND RESULTS ACHIEVED

In response to the inspector's observation, Regulatory Affairs Management re-reviewed the license requirements and re-confirmed that the ongoing CSE's and future ISA's and their written guidelines fulfill our license commitment. Concurrence was obtained from the Plant Manager and his Staff. Consequently, no additional actions are required.

D.4 ACTIONS TO IMPROVE THE PROGRAM

Beyond the year 2000, required reviews will be performed in accordance with the Configuration Management process. These reviews will be performed in accordance with new formal guidelines approved by Plant Management.

D.5 DATE WHEN FULL COMPLIANCE WAS ACHIEVED
Not applicable.

APPENDIX B

ADDITIONAL INFORMATION

This information responds to the statement in the January 23, 1997 NRC letter, as follows: "The NRC is concerned about these violations because no mechanism was developed to assure that the specific license requirements involved were being implemented in accordance with management's expectations."

As noted in Appendix A, parts A-D, the specific license requirements noted in the subject inspection were being implemented. Notwithstanding this fact, on January 29, 1997, the Columbia Plant individual with principal responsibility for consolidation of the License Application completed and distributed, to cognizant Regulatory management and professional personnel, a detailed review of the Application's commitments with respect to "AUDITS AND SELF-ASSESSMENTS", to re-affirm that responsible individuals understood the commitments.

Moreover, during the development of the renewed License SNM-1107, a formal "project organization" team was formed to ensure that appropriate administrative and technical input was provided to the License Renewal Project Manager. This team was led by the current Columbia Plant Manager as "Authorizing Sponsor", three current members of the RCC as "Reinforcing Sponsors", and other appropriate middle-level managers serving as "Mentors". As part of this effort, all working drafts of the Application were distributed to cognizant personnel for review, comment and re-write as appropriate. This input assured that the "owners" of the programs were well aware of, and committed to, the licensing process. Further, many of these individuals were involved in responding to NRC questions during the negotiation period of license renewal. Therefore, we believe that applicable personnel at the Columbia Plant are aware of the license commitments and management's expectations.

However, based on the observations documented in the subject Inspection Report, Westinghouse Columbia Plant management is concerned with this and other recent NRC inspections in terms of interpretational discrepancies between NRC Inspectors and Westinghouse personnel regarding license commitments. Westinghouse management is currently in discussions with NRC management in an attempt to eventually resolve this issue.

Westinghouse
Electric Corporation
January 15, 1992

Commercial Nuclear
Fuel Division

Drawer R
Columbia SC 29250
(803) 776 2610

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

Gentlemen:

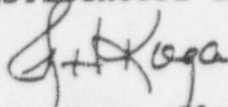
REFERENCE: NRC BULLETIN 91-01 -- "REPORTING LOSS OF CRITICALITY
SAFETY CONTROLS"

Westinghouse herein provides a statement describing its reporting criteria and management implementation procedures for evaluation and reporting related to loss of criticality safety controls which meet the requirements of 10 CFR 20.403(a) -- for its Columbia Fuel Fabrication Facility. Implementing procedures and documentation will be kept readily available for follow-up NRC inspection.

I hereby affirm that the commitments made in this statement 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



R.H. Koga, Plant Manager
Columbia Fuel Fabrication Facility

Attachment

cc: U.S. NUCLEAR REGULATORY COMMISSION, REGION II
Regional Administrator
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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WESTINGHOUSE STATEMENT DESCRIBING
REPORTING CRITERIA AND MANAGEMENT IMPLEMENTATION PROCEDURES FOR
EVALUATIONS AND NOTIFICATIONS RELATED TO LOSS OF
NUCLEAR CRITICALITY SAFETY CONTROLS

The Westinghouse Columbia Fuel Fabrication Facility's "Plan For Addressing Requirements Of NRC Bulletin 91-01", to assure proper reporting of nuclear criticality safety-significant events within the organization, and external notification of NRC (when applicable), consists of five major facets:

- **RE-EVALUATION OF PROCESS SYSTEMS TO ANALYZE CONTINGENCIES, AND IDENTIFY CONTROL BARRIERS**

Operating plant systems, significant to nuclear criticality safety, have been prioritized for (and are undergoing) zero-based criticality safety assessments by a multi-disciplined review Team. The standing Team consists of representatives from product and process development and design, process engineering, maintenance, and nuclear criticality safety engineering -- supplemented by ad hoc members on an as-needed basis; and, the Team reports to the Site Regulatory Compliance Committee, which consists of the Plant Manager and appropriate members of his Staff. This Team's deliverables include concise double-contingency analyses, for each reviewed system, which document safety-significant barriers and their controls. These analyses will greatly facilitate future evaluations by nuclear criticality safety engineers -- especially in event of process upsets -- for proper reporting and timely notifications (which are procedurally based on graded "degradation-of-controls" formulae). This substantial task is well underway. Completion of Phase I ("high" priority) systems is currently scheduled for the First Quarter of 1992; completion of Phase II ("intermediate" priority) systems is currently scheduled for the Fourth Quarter of 1992; and, completion of the balance-of-Plant systems, including consolidation of all assessment outputs into a format best usable by criticality specialists, is currently scheduled for the Fourth Quarter of 1993.

- **REVISION OF THE SITE REPORTING/NOTIFICATION PROCEDURE**

Regulatory Affairs Procedure RA-107 "REPORTING UNUSUAL OCCURRENCES" (Revision 1), is being re-designated "INTERNAL REPORTING, AND NRC NOTIFICATION, OF UNUSUAL OCCURRENCES" (Revision 2) -- to expand its scope to fully address the provisions of NRC Bulletin 91-01. Salient new features include:

- Expansion of the Procedure "POLICY" -- requiring immediate internal reporting of ALL safety-significant events involving inability to follow a procedure, or a process upset, to supervision and Regulatory Affairs -- to encompass how reported nuclear criticality safety events will result in timely notification of NRC. (This policy provides a clear statement that Columbia Plant criticality safety specialists shall have the lead role in investigation of unplanned nuclear criticality safety events discovered and/or reported to Regulatory Affairs; shall direct the subsequent determination of system degradation; and, shall be directly involved in Management's evaluation of notification requirements.)
- Expansion of the "REPORTING OF UNUSUAL OCCURRENCES" procedure to provide specific examples of nuclear criticality safety events that are to be immediately reported to Supervisors by all employees.
- Expansion of the "REPORTING OF SAFETY-SIGNIFICANT EVENTS" procedure to provide graphical information flow requirements to Supervisors concerning "dual-path" appraisals of both higher management and Regulatory Affairs.
- Expansion of the "IMMEDIATE NOTIFICATION" procedure to require appraisal of NRC (under "ALERT" requirements of the Site Emergency Plan) as soon as possible (within one-hour of discovery) of any ongoing nuclear criticality safety event involving significant deterioration of safety barriers -- including a clarifying example.
- Expansion of the "TWENTY-FOUR HOUR NOTIFICATION" procedure to require appraisal of NRC (under "LOCAL EMERGENCY" requirements of the Site Emergency Plan), within 24-hours of discovery, if the nuclear criticality safety evaluation of a reported event discloses:
 - (1) A situation where only a single contingency is required for criticality to be possible; or,
 - (2) Loss of a barrier, when no more than one control remains for each additional barrier described in the subject system's double contingency analysis; or,
 - (3) That a license-specified contingency interlock fails to function on demand under an actual process upset situation; or,
 - (4) That a criticality safety limit was intentionally violated by an individual taking advantage of a safety margin; or,
 - (5) An incident, or re-calculation -- involving a computer analysis of an operating system -- for which the potential K_{eff} is found to be significantly greater than that of the original analysis
 -- including three clarifying examples.

- Expansion of the "COURTESY CALLS" procedure to require a telecon to the NRC Region II office whenever:
 - (1) One-hour or 24-hour NRC notifications are made; or,
 - (2) An evaluation of a reported nuclear criticality safety-significant event discloses loss of multiple controls, without loss of a barrier.

The revised Procedure is under review, and is currently scheduled for approval and implementation during the First Quarter of 1992.

• REVISION OF THE SITE EMERGENCY PLAN

The Site Emergency Plan is being revised to formally require immediate notification of defined nuclear criticality safety events under its "ALERT" communication provisions, and 24-hour notification of defined nuclear criticality safety events under its "LOCAL EMERGENCY" communication provisions -- as previously described under the "REVISION OF THE SITE REPORTING/NOTIFICATION PROCEDURE" section of this Statement. This revision is under review, and is currently scheduled for internal approval and submittal to NRC during the First Quarter of 1992.

• TRAINING OF OPERATORS AND SUPERVISORS

Two training programs, emphasizing specific examples of reportable events, will be provided to apprise all operators and their supervisors of additional work requirements arising out of response to NRC Bulletin 91-01:

- Training for all operators will be presented by their Supervisors, with the cognizant Staff Manager and a Nuclear Criticality Safety Engineer in conspicuous attendance. The core message of this training is to "report ALL process upsets and inability to follow procedures to the cognizant Supervisor".
- Training for all Supervisors will be presented by a Nuclear Criticality Safety Engineer. The core messages of this training is to (1) document ALL reported process upsets and inability to follow procedures for Regulatory Affairs audit; and (2) assume OWNERSHIP of ALL reported process upsets and inability to follow procedures, and seek IMMEDIATE Process Engineer AND Nuclear Criticality Safety Engineer help in addressing nuclear criticality safety-significant reports.

Training scripts have been developed and are under review, and training is currently scheduled to be completed during the First Quarter of 1992.



From: Columbia - Commercial Nuclear Fuel Division
WIN 426-3300
Date January 17, 1997
Subject: COLUMBIA FUEL FABRICATION FACILITY (CFFF) POLICY ON THE
PURPOSE AND OBJECTIVES OF SELF-ASSESSMENT

To: J. R. Bush
W. L. Goodwin
E. E. Keelen
S. G. McDonald


Here at the Columbia Plant, we have developed and are implementing a good program of audits and self-assessments. As we move into the challenges of 1997 and beyond, it is important that we continue to maximize benefits from this program. As part of our efforts to focus awareness on self-assessment implementation, I am sending the attached memo on self-disclosure of process upsets and inability to follow procedures to all employees. This is simply a continuation of Ron Koga's policy when the self-disclosure process was first instituted.

The purpose of the self-assessment is to aggressively disclose and forcefully report identified process upsets and procedural inadequacies before they self-reveal and/or Regulatory Agencies find them. The objective of self-assessment is to assure that operations at the Columbia Plant are conducted in such a manner as to protect the environment and the health and safety of our workers and the neighboring public.

I am confident that you will continue to aggressively demand that our self-assessment performance meets the highest standard of quality.

J. A. Fici
J. A. Fici, Manager
Columbia Plant

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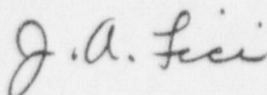
From Columbia - Commercial Nuclear Fuel Division
WIN 426-3300
Date January 17, 1997
Subject SELF-DISCLOSURE OF PROCESS UPSETS AND INABILITY TO FOLLOW PROCEDURES

To ALL EMPLOYEES

At the Columbia Plant, we certainly have a commitment to efficiently manufacture our products in a timely manner to meet customer shipment schedules. However, we have equivalent commitments (1) to produce a quality product, and (2) to perform our tasks in a safe manner, in full compliance with all applicable regulatory requirements. Our Manufacturing, Product Assurance and Regulatory Affairs functions require the use of detailed operating procedures that have been approved by plant management. It is imperative that these procedures are followed to the letter; violations will not be tolerated. If you observe any procedure violation, safety problem, or an equipment or operational anomaly, or you experience any inability to follow procedures, it should be reported to your immediate supervisor and Regulatory Affairs through use of our "Redbook" process.

We also have, in place, a system for reviewing and approving modifications to equipment and operations. This system of design reviews, regulatory review requests, etc., includes requirements for cognizant expert and management evaluations of such changes. Modifications must always be documented and implemented in accordance with these established procedures. Again, if you observe any operation being performed or equipment being used, without proper approval, notify your immediate supervisor and Regulatory Affairs through use of our "Redbook" process.

In summary, we all have a responsibility to operate our workplace in a safe manner, in full compliance with all applicable rules and regulations. ***ALWAYS OBEY COLUMBIA PLANT SAFETY LIMITS AND PROCEDURES, AND PROMPTLY REPORT ANY UNSAFE ACT OR CONDITION TO LINE MANAGEMENT AND REGULATORY AFFAIRS.***



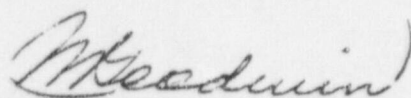
J. A. Fici, Manager
Columbia Plant

raw\97-004

TO: Dave Williams
FROM: Regulatory Affairs
DATE: 24 JAN 97
SUBJECT: CLARIFICATION OF LICENSE REQUIREMENT

SNM-1107, paragraph 3.6.1(b), states in part: "... will conduct monthly formal audits ... to find process upsets and procedural inadequacies well beyond those surfaced by simple paperwork reviews".

This simply means that, AS YOU ARE ALREADY DOING, your formal monthly Regulatory Compliance Inspections for criticality, safeguards, radiation protection, and industrial safety WILL CONSIST OF ON-THE-FLOOR TOURS, and not simply a paper review "back in the office".



Wilbur Goodwin, Manager
Regulatory Affairs