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Westinghouse Electric Company LLC
Nuclear Fuel
Columbia Fuel Site
5801 Bluff Road
Hopkins, South Carolina 29061-9121
USA

DEC 27 2019

SCANNED

SITE ASSESSMENT,
REMEDICATION &
REVITALIZATION

Ms. Kuhn
South Carolina Department of Health and
Environmental Control
Bureau of Land and Waste Management
2600 Bull Street
Columbia, SC 29201

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Our Ref: LTR-RAC-19-101

Date: December 18, 2019

**Subject: Updated Communication Protocol
Consent Agreement 19-02-HW**

Dear Ms. Kuhn,

Per our ongoing discussions since your June 10 letter listing the Department's comments on the Communication Protocol developed by Westinghouse pursuant to the Consent Agreement, Westinghouse submits this updated protocol for your approval. Westinghouse appreciates the Department's request for timely information regarding potential releases, and we share your goal of efficient information-sharing. To that end, should a potential release to the environment be suspected, Westinghouse will provide an informal courtesy call to at least one of the Department officials named in the June 10 letter by phone. Westinghouse will then follow-up with a courtesy email to all three officials to ensure the phone message was received as well as provide an update.

As for what constitutes a "potential release," Westinghouse is not aware of this term being defined by federal or state regulations. Therefore, Westinghouse will use its best judgment in assessing when a breach could reasonably be expected to contaminate the soil or water, erring on the side of informing the Department when a definitive conclusion cannot be made.

Lastly, where a release is confirmed and reportable per federal or state regulations, Westinghouse will notify DEHC pursuant to the regulatory requirements and the protocol followed by an update call.

Yours very truly,

Nancy Blair Parr

Nancy Blair Parr
Environment, Health and Safety (EH&S)

Attachment: Communication Protocol Flowchart

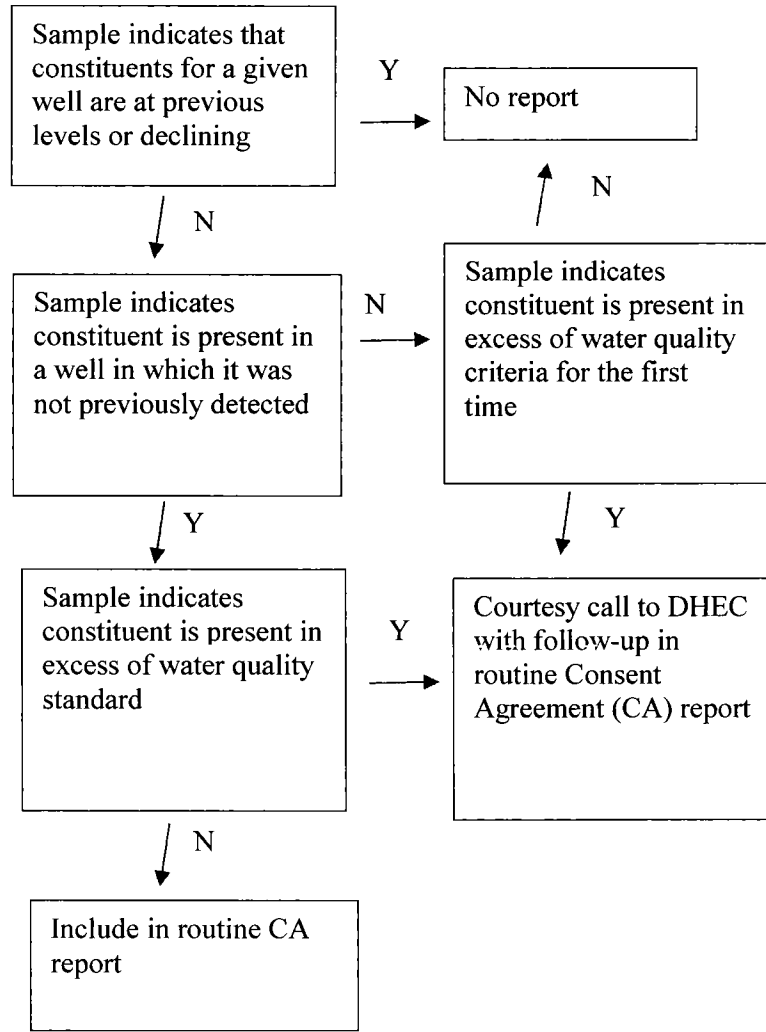
cc: J. Ferguson, EH&S Manager
V. Kelmeckis, Corporate Environmental Manager
J. Pricener, Counsel for EH&S
D. Joyner, EH&S

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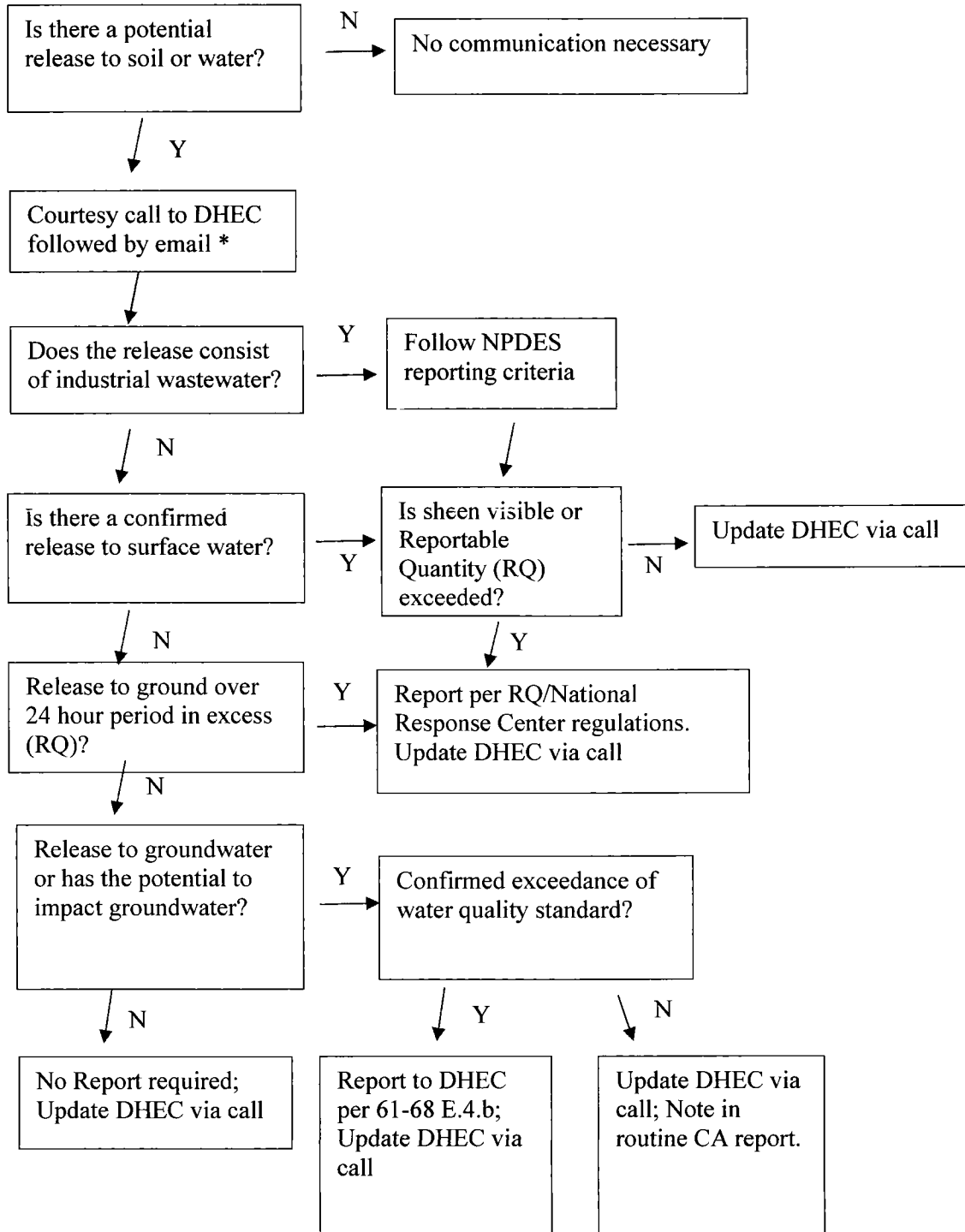
C. Logsdon, EH&S
A. Pope, Organizational Effectiveness Manager
ENOVIA records

Release Reporting Protocol

Possible release indicated by monitoring well data



A Potential Release from Equipment Failure or Spill



* This presumes a delay between recognition of release potential and confirmation. In cases where it is immediately apparent that the one of the regulatory notifications are triggered, such notification will be made followed by a courtesy call to DHEC.