



David A. Swank  
Columbia Generating Station  
P.O. Box 968, PE23  
Richland, WA 99352-0968  
Ph. 509-377-2309 | F. 509-377-2354  
daswank@energy-northwest.com

October 25, 2012  
GO2-12-149

10 CFR 2.202  
10 CFR 50.4

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

Subject: **COLUMBIA GENERATING STATION, DOCKET NO. 50-397  
ENERGY NORTHWEST'S INITIAL STATUS REPORT IN RESPONSE TO  
MARCH 12, 2012 COMMISSION ORDER MODIFYING LICENSES WITH  
REGARD TO REQUIREMENTS FOR MITIGATION STRATEGIES FOR  
BEYOND-DESIGN-BASIS EXTERNAL EVENTS**

- Reference:
1. NRC Order Number EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events
  2. NRC Interim Staff Guidance JLD-ISG-2012-01, Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events, Revision 0, dated August 29, 2012
  3. Nuclear Energy Institute (NEI) Letter to NRC, Industry Initiative on Procurement of Equipment for the Diverse and Flexible Coping Strategy (FLEX), dated February 24, 2012
  4. NEI 12-06, Diverse and Flexible Coping Strategies (FLEX) Implementation Guide, Revision 0, dated August 2012

Dear Sir or Madam:

On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued the referenced Order (Reference 1) to Columbia Generating Station (Columbia). Reference 1 directs Columbia to develop, implement, and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event. Specific requirements are outlined in Attachment 2 of Reference 1. Full implementation is required no later than either two refueling cycles after submittal of the overall integrated plan or by December 31, 2016, whichever comes first.

A151  
NRR

**ENERGY NORTHWEST'S INITIAL STATUS REPORT IN RESPONSE TO  
MARCH 12, 2012 COMMISSION ORDER MODIFYING LICENSES WITH REGARD TO  
REQUIREMENTS FOR MITIGATION STRATEGIES FOR BEYOND-DESIGN-BASIS  
EXTERNAL EVENTS**

Page 2 of 3

Reference 1 requires submission of an initial status report 60 days following issuance of the final interim staff guidance. The purpose of this letter is to provide the initial status report pursuant to Section IV, Condition C.2, of Reference 1 within 60 days following issuance of Reference 2. This report confirms Energy Northwest, the licensee for Columbia, has received Reference 2 and is in the process of evaluating the guidance for establishing mitigation strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event as described in Attachment 2 of Reference 1.

Major activities completed during this reporting period:

- Portable equipment was ordered as described in an NEI letter to the NRC (Reference 3).
- A site-specific evaluation is in progress to establish the coping capabilities as defined in NEI 12-06 (Reference 4).
- Resources have been identified and project plans initiated, including development of milestones, to assure compliance with Reference 1.

Planned activities for the next six months:

- Development and submittal of the overall integrated plan.
- Develop and refine mitigation strategies.

No technical difficulties have been identified at this time that could affect the ability to provide the February 28, 2013, submittal.

Project milestones scheduled through completion of installation and testing:

- A project milestones schedule will be provided with the overall integrated plan.
- Implementation of the order will be completed for Columbia prior to startup from Refueling Outage R22. This outage is scheduled to begin May 1, 2015.

There are no new commitments contained in this letter. If you have any questions regarding the above, please contact Mr. Z. K. Dunham at (509) 377-4735.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the date of this letter.

**ENERGY NORTHWEST'S INITIAL STATUS REPORT IN RESPONSE TO  
MARCH 12, 2012 COMMISSION ORDER MODIFYING LICENSES WITH REGARD TO  
REQUIREMENTS FOR MITIGATION STRATEGIES FOR BEYOND-DESIGN-BASIS  
EXTERNAL EVENTS**

Page 3 of 3

Respectfully,



D. A. Swank  
Assistant Vice President, Engineering

cc: NRC Region IV Administrator  
NRC NRR Project Manager  
NRC Senior Resident Inspector/988C  
AJ Rapacz – BPA/1399