

ENERGY NORTHWEST

P.O. Box 968 ■ Richland, Washington 99352-0968

January 28, 2002
GO2-02-016

Docket No. 50-397

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Gentlemen:

Subject: **COLUMBIA GENERATING STATION, OPERATING LICENSE NPF-21
REPLY TO FINAL SIGNIFICANCE DETERMINATION FOR A YELLOW
FINDING AND NOTICE OF VIOLATION (NRC INSPECTION REPORT 50-
397/01-008)**

- References: 1) Letter dated October 15, 2001, AT Howell III, (NRC) to JV Parrish (Energy Northwest), "NRC Inspection Report No. 50-397/01-008; Preliminary Yellow Finding"
- 2) Letter dated December 28, 2001, EW Merschoff (NRC) to JV Parrish (Energy Northwest), "Final Significance Determination for a Yellow Finding and Notice of Violation (NRC Inspection Report No. 50-397/01-008)"

On December 28, 2001, the Nuclear Regulatory Commission (NRC) concluded that for the period from October 1997 to July 2001 weaknesses in the Columbia Generating Station emergency preparedness program warranted characterization of the NRC finding as yellow. Specifically, the weaknesses involved the level of protection afforded to certain lessees within the Columbia Generating Station exclusion area. After careful consideration of this enforcement action, Energy Northwest has determined that it will not contest the violation nor appeal the yellow categorization made pursuant to the Significance Determination Process (SDP).

The reply to the Notice of Violation is attached.

We acknowledge that our responsiveness and aggressiveness were less than adequate in addressing concerns identified by Washington state representatives and the NRC staff. In an effort to address the issues we will improve our communications regarding NRC and Washington state identified concerns that involve operation of the Columbia Generating Station. In the future, we will be placing additional emphasis on our communications that hopefully will provide sufficient detail for all parties to reach agreement regarding the facts associated with a particular concern or issue.

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We will be providing further information in a follow-up letter regarding the actual procedures, processes, and programs that were in place prior to April 2001. The purpose of that letter will be to provide information to ensure the docket for Columbia Generating Station is accurate, in that we will be addressing inaccuracies contained in references 1 and 2.

If you have any questions or desire additional information regarding this matter, please call Ms. CL Perino at (509) 377-2075.

Respectfully,



RL Webring
Vice President, Operations Support/PIO
Mail Drop PE08

Attachment

cc: JS Cushing - NRC NRR
EW Merschoff - NRC RIV
NRC Sr. Resident Inspector - 988C
TC Poindexter - Winston & Strawn
DL Williams - BPA/1399

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RESTATEMENT OF VIOLATION

10 CFR 50.54(q) states, in part, that a licensee authorized to possess and operate a nuclear power reactor shall follow and maintain in effect emergency plans which meet the standards in 50.47(b). 10 CFR 50.47(b)(10) requires that the onsite emergency response plans for nuclear power reactors must meet the following standard, which states, in part: "A range of protective actions have been developed for the plume exposure pathway emergency planning zone for emergency workers and the public. Guidelines for the choice of protective actions during an emergency, consistent with Federal guidance, are developed and in place."

The Federal guidance is contained in NUREG-0654, FEMA-REP-1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants." Section J provides the evaluation criteria for this planning standard. Section J.1 states, in part, that the licensee shall establish the means and time required to warn or advise onsite individuals and individuals who may be in areas controlled by the operator. Section J.2 states, in part, that the licensee shall make provisions for evacuation routes and transportation for onsite individuals to some suitable offsite location, including alternatives for inclement weather and specific radiological conditions. Section J.3 states, in part, that each licensee shall provide for radiological monitoring of people evacuated from the site. Section J.4 states, in part, that each licensee shall provide a decontamination capability at or near the monitoring point specified in Section J.3.

Contrary to the above, from October 14, 1997, to July 23, 2001, a range of protective actions for certain members of the public within Columbia Generating Station's plume exposure pathway emergency planning zone had not been developed. Specifically, the licensee had not developed a range of protective actions for employees of private businesses leasing space within the licensee's exclusion area which were consistent with Federal guidance, as described below.

- The licensee had not adequately developed the means and time required to warn or advise lessee employees by activation of a reliable notification system. Specifically, the licensee's sirens could not be heard indoors at some lessee sites, and the crossroads siren (the primary siren for that area) was unavailable between October 1997 and March 1998 while lessee employees were onsite. In addition, other licensee notification processes did not apply to lessees, an evacuation sign was not effective based on the fact that several lessee employees were unfamiliar with the response to the siren, the telephone notification would not be fully effective during off-hours because it relied on someone being near the phone that was called, and mobile patrol security sweeps would not be fully effective during off-hours because of the lack of training and procedures.

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- The licensee had not adequately developed the means for evacuation routes and transportation to some suitable offsite location. Specifically, many lessee employees had not been trained on the WNP-1 Construction Site Emergency Evacuation and Response Plan or the evacuation routes established in the CGS Emergency Plan, CGS personnel designated to act as the Emergency Directors were not trained about the presence of the lessee employees in the exclusion area boundary, and the licensee's dependence on security officers, who would be assigned to a roadblock, would not be fully effective in informing lessee employees of situation-specific evacuation routes because roadblocks would not be established if a radiological release affected the plant access roads.
- The licensee had not adequately developed the means for radiological monitoring of people evacuated from the site and a decontamination capability at the monitoring location. Specifically, lessee employees had not been trained on the CGS Emergency Plan and were unaware of the location and function of offsite assembly areas, including radiological monitoring and decontamination capabilities. Many lessee employees who were interviewed did not understand that Energy Northwest was responsible for radiological monitoring. The WNP-1 Construction Site Emergency Evacuation and Response Plan did not address radiological monitoring for lessee evacuees, and the CGS emergency response organization was not trained about the presence of lessee employees in the exclusion area boundary.

I. RESPONSE TO VIOLATION

Energy Northwest accepts this violation.

II. REASON FOR VIOLATION

The reason for the violation is inadequate monitoring of activities within the Columbia Generating Station exclusion area boundary regarding emergency preparedness. Specifically, the emergency preparedness organization inadequately monitored the implementation of the Site One Emergency Evacuation and Response Plan.

A contributing cause was absence of specific procedural requirements to ensure an evaluation of a Site One change for its impact on Columbia Generating Station programs.

The above causes led to:

- inadequate development of means and time required to warn or advise lessees within the exclusion area (NUREG 0654, Section J, Protective Response, criteria 1);

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- inadequate notification and training regarding evacuation routes and transportation to some suitable offsite location for lessees (NUREG 0654, Section J, Protective Response, criteria 2);
- inadequate development of detailed instructions regarding radiological monitoring and location of offsite assembly areas for lessees evacuated from the site (NUREG 0654, Section J, Protective Response, criteria 3 and 4).

III. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

Full compliance has been achieved by implementation of the following actions.

A. The following notification and evacuation actions have been implemented.

1. A Site One designated site authority (DSA) will be onsite; or
2. A Site One employee is stationed in the guardhouse on the access road to Site One; or
3. The gate on the access road to Site One is locked.

The Site One DSA or the Site One employee will implement the notification and evacuation plan for Site One including lessees. When the DSA or the Site One employee is not onsite the gate will be locked to preclude access to Site One.

B. Corrective actions taken to address NUREG 0654, Section J, criteria 1; to warn or advise:

1. Training of tenants at Site One regarding evacuation was enhanced as follows:
 - a. A briefing was provided to Site One tenants regarding exclusion area evacuation.
 - b. The emergency preparedness organization was assigned a recurring action to ensure an annual briefing regarding notification and evacuation from the Columbia Generating Station exclusion area is provided to Site One tenants, visitor center hosts, Energy Northwest employees, and contractors.
2. The emergency telephone notification scheme was enhanced as follows:
 - a. The Emergency Phone Directory, Part C Notification Checklist was revised to add phone numbers for the: 1) maintenance training facility, 2) security training facility, and 3) the visitor's center.
 - b. The central alarm station (CAS) checklist and Plant Procedures Manual (PPM) 13.5.3, "Evacuation of Exclusion Area And/Or Nearby Facilities," were revised to include a call-tree for lessees within the exclusion area.

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3. Enhancements regarding Site One evacuation implementation include a revision to PPM 13.5.3, "Evacuation of Exclusion Area And/Or Nearby Facilities" to evacuate Site One upon declaration of a Site Area Emergency at Columbia Generating Station.
 4. Activation of the Site One sirens was enhanced as follows:
 - a. The security communications center (SCC) was modified to allow remote activation of the two Site One sirens.
 - b. The SCC checklist has been revised to include instructions regarding activation of the two Site One sirens from the SCC.
 - c. The SCC duty officers reviewed the revised checklist regarding the activation of the Site One sirens.
- C. Corrective actions taken to address NUREG 0654, Section J, criteria 2; establishment of evacuation routes and transportation to suitable offsite location.
1. PPM 13.5.3, "Evacuation of Exclusion Area And/Or Nearby Facilities," was revised to include two pre-scripted messages regarding where to evacuate Site One employees and some lessees. Evacuees will be directed to proceed to a remote monitoring location or home. Initially, the security supervisor in the CAS is responsible for making the above announcement. When the emergency operations facility (EOF) is activated, the security manager in the EOF is responsible for making the announcements.
 2. Security roadblock kits were upgraded to include enhanced evacuation route maps with directions to the offsite monitoring locations. Sufficient copies of the map and instructions are included in the kits and will be provided to evacuees.
 3. The Site One Emergency and Evacuation Response Plan was revised to add specific evacuation instructions. In addition, instructions were added regarding the potential need to report to an offsite location for monitoring and decontamination.
 4. Energy Northwest provided an initial briefing to existing tenants regarding emergency evacuation notification and required response. In addition, Energy Northwest will provide an annual refresher briefing to tenants regarding emergency evacuation notification and required response (see actions III.B.1.a and b above).
- D. Corrective actions taken to address NUREG 0654, Section J, criteria 3 and 4; radiological monitoring.

Site One evacuees normally will be instructed to proceed home. Site One evacuees will be directed to an Energy Northwest assembly area for radiological monitoring if radiological

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conditions warrant. If radiological decontamination is necessary, this will be performed. Setup and operation of the offsite assembly area for evacuee processing and monitoring is described in existing procedure PPM 13.7.5, "Offsite Assembly Area Operations."

1. A briefing regarding evacuation instructions was provided to the Site One tenants. The briefing included the potential need to respond to an offsite monitoring location as necessary. In addition, the tenants were provided a handout describing these actions and a map to the Energy Northwest offsite assembly area (see action III.B.1.a above).
2. PPM 13.5.3, "Evacuation of Exclusion Area And/Or Nearby Facilities," was revised to include two pre-scripted messages regarding where to evacuate Site One employees and some lessees. Evacuees will be directed to proceed to a remote monitoring location or home (see action III.C.1 above).
3. Security roadblock kits were upgraded to include enhanced evacuation route maps with directions to the offsite monitoring locations. Sufficient copies of the map and instructions are included in the kits and will be provided to evacuees (see action III.C.2 above).

E. Planned corrective actions that will address other NUREG 0654 Section J issues:

1. Upgrade Site One emergency alerting and PA capability to provide Site One personnel (including lessees and contractors) notification regarding emergency conditions and required actions. This also includes the ability to initiate the alerting tone and PA from the Columbia Generating Station SCC as well as from Site One.

Note: The three corrective action options noted in III.A above will not be necessary when this corrective action is fully implemented

2. Provide an initial briefing to new tenants, new employees of existing tenants, and those existing employees not present when the briefing noted in III.C.4 (above) was provided. This briefing will inform them of emergency evacuation notification and required response. In addition, Energy Northwest will provide an annual refresher briefing to tenants regarding emergency evacuation notification and required response (see action III.B.1.b above).
3. Perform an off hours drill to demonstrate evacuation of the Columbia Generating Station exclusion area, including Site One tenants, to verify the enhancements to the emergency preparedness program.
4. Provide a change management update regarding Site One notification and evacuation process to Emergency Response personnel including: TSC Managers, EOF Managers, Shift Managers, Security Managers, and Security Lieutenants.

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5. Revise Initial Training Materials to incorporate updated information regarding Site One notification and evacuation.

F. Other actions:

1. The Energy Northwest Columbia Generating Station emergency preparedness organization will formalize monitoring of emergency preparedness support at Site One.
2. Develop specific procedural requirements to ensure that certain future changes to Site One are evaluated regarding their impact on Columbia Generating Station programs.

IV. CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

Corrective actions previously noted also are intended to avoid further violations.

V. DATE WHEN FULL COMPLIANCE WAS ACHIEVED

Full compliance regarding this violation was achieved on January 28, 2002.