



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064

March 6, 2002

EA 01-236

Mr. J. V. Parrish
Chief Executive Officer
Energy Northwest
P.O. Box 968; MD 1023
Richland, Washington 99352-0968

SUBJECT: REGULATORY PERFORMANCE MEETING WITH COLUMBIA GENERATING
STATION

Dear Mr. Parrish:

This refers to the regulatory performance meeting conducted at the Energy Northwest Office Complex Auditorium, 3000 George Washington Way, Richland, Washington, on February 21, 2002. This meeting was conducted to discuss the root causes, extent of condition, and licensee corrective actions related to a yellow finding and an associated violation of 10 CFR 50.54(q) involving the failure to maintain emergency plans and procedures which meet the standards in 10 CFR 50.47(b) for the development of a range of protective actions for the public. The meeting attendance list and licensee presentation are enclosed with this summary.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and its enclosures will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Website at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Should you have any questions concerning this matter, we will be pleased to discuss them with you.

Sincerely,

A handwritten signature in black ink, appearing to read "Gail M. Good".

Gail M. Good, Chief
Plant Support Branch
Division of Reactor Safety

Docket: 50-397
License: NPF-21

Energy Northwest

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Enclosures:

1. Attendance List
2. Licensee Presentation

cc with Enclosure 1:

Chairman
Energy Facility Site Evaluation Council
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Rodney L. Webring (Mail Drop PE08)
Vice President, Operations Support/PIO
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State Liaison Officer
Executive Policy Division
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Olympia, Washington 98504-3113

Lynn Albin
Washington State Department of Health
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Training, Exercises, & Evaluation
Branch Chief
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Federal Regional Center
130 228th Street, S.W.
Bothell, WA 98021-9796

Electronic distribution from ADAMS by RIV w/out Enclosure 2:

- Regional Administrator (**EWM**)
- DRP Director (**KEB**)
- DRS Director (**ATH**)
- Branch Chief, DRS/PSB (**GMG**)
- Inspector, DRS/PSB (**PJE**)
- Senior Resident Inspector (**GDR**)
- Branch Chief, DRP/E (**WBJ**)
- Senior Project Engineer, DRP/E (**GAP**)
- Staff Chief, DRP/TSS (**PHH**)
- Section Chief, EP/HP Section, IRSB (**KHG**)
- RITS Coordinator (**NBH**)
- Director ACES (**GFS**)
- OE:EA File (**RidsOeMailCenter**)
- OE (**MCN**)
- Regional State Liaison Officer (**WAM**)

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PJEIkman:nlh	GMGood <i>6/16</i>			
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<i>2/28/02</i>	<i>2/28/02</i>			

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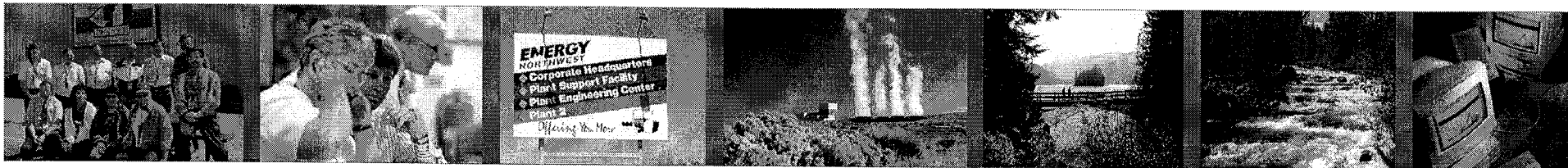
F=Fax

ENCLOSURE 1
Columbia Generating Station
Emergency Preparedness Regulatory Performance Meeting
February 21, 2002

ATTENDANCE LIST		
NAME	ORGANIZATION	POSITION/TITLE
Vic Parrish	Energy Northwest	Chief Executive Officer
Rod Webring	Energy Northwest	Vice President, Operations Support/ PIO
Doug Coleman	Energy Northwest	Manager, Performance Assessment and Regulatory Programs
John Wyrick	Energy Northwest	Resource Protection Manager
Greg Smith	Energy Northwest	Vice President, Generation
David Fraley	Energy Northwest	Manager, WNP Unit 1
Steve Goodwin	Energy Northwest	Acting Quality Supervisor
Loren Oakes	Energy Northwest	
John Arbuckle	Energy Northwest	
Dave Mueller	Energy Northwest	
Gary Miller	Energy Northwest	
John Ittner	Energy Northwest	
Alfred Klauss	Energy Northwest	
Christina Perino	Energy Northwest	
Ron Jorgensen	Energy Northwest	
Dave Holmes	Energy Northwest	
Marianne Collins	Energy Northwest	
Art Howell	NRC, Region IV	Director, Division of Reactor Safety
Gail M. Good	NRC, Region IV	Chief, Plant Support Branch
Ryan E. Lantz	NRC, Region IV	Senior Emergency Preparedness Inspector, PSB, DRS
Paul Elkmann	NRC, Region IV	Emergency Preparedness Inspector, PSB, DRS
Michael Peck	NRC, Region IV	Resident Inspector, Columbia Generating Station

ATTENDANCE LIST

NAME	ORGANIZATION	POSITION/TITLE
Eleanor C. Castle	FEMA RX	
John Scheer	Franklin County WA, Emergency Management	Manager
Allen Fiksdall	Washington State EFSEC	
Rick Garza	Benton County WA, Emergency Management	Manager
Ed Brost	Bonneville Power Authority	
Vanita Boston	DOE Richland	
June Ollero	DOE Richland	
Neil Shroff	Durametal Brake Co.	
Johanna Berckey	Washington State Department of Health	
Ben Bennett	Port of Benton	
John Stang	Tri-City Herald	



Energy Northwest

John Wyrick

Manager, Resource Protection

Root Cause

Root Cause

Inadequate monitoring by the emergency preparedness organization of Site One emergency plan implementation.

Symptoms

- **The EP organization did not rigorously assess the effectiveness of Emergency Plan implementation at Site One.**
- **Provisions for the EP organization to review Site One lease contracts was inadequate.**
- **The interface between the EP organization and the Site One management team was inadequate.**

The EP organization did not rigorously assess the effectiveness of Emergency Plan implementation at Site One.

- **Independent Assessment Board (Industry Peers)**
- **EP Organization Internal Self-Assessment**
- **Quality Assurance Internal Audit**
- **Ongoing/focused self-assessments**

Provisions for the EP organization to review Site One lease contracts was inadequate.

- **EP review of contracts has been incorporated into Procurement work processes.**

The interface between the EP organization and the Site One management team was inadequate.

- **Memorandum of Understanding**
- **Procedure changes**
- **Successful Site One Notification/Evacuation drill conducted (9/2001)**

Root Cause

Inadequate monitoring by the emergency preparedness organization of Site One emergency plan implementation.

Conclusion:

In addition to programmatic problems, there were issues with human performance.

Actions taken:

- Personnel Changes
- Individual plans for improved performance

Emergency Preparedness Program Enhancements

EP Program Enhancements

Physical Changes

- **Site One gate**
- **PA upgrade (ongoing)**
- **Remote siren activation**

Procedural Changes

- **Site One early evacuation (SAE)**
- **Instructions for security sweep**
- **Requirements for siren testing**

EP Program Enhancements

Training

- **Tenant training (initial & recurring)**
- **Emergency response instructions on ID badge**
- **Department Manager mail-out regarding notification and evacuation**

Program Changes

- **Site One Emergency & Evacuation Plan was updated**
- **Extended DSA coverage of Site One**

Personnel

- **Site One Monitor**

Extent of Condition

Extent of Condition

- Does the issue of inadequate monitoring extend beyond Site One?
- Are there structures/personnel for which inadequate notification methods exist?
- Are drills conducted on major points of the Emergency Plan every 6 years?
- Are there problems tracking and repairing inoperable emergency equipment?
- Is the equipment testing program sufficiently comprehensive
- Is the training program sufficiently comprehensive?
- Is the independent oversight program sufficiently comprehensive?

Does the issue of inadequate monitoring extend beyond Site One?

- **Formalized responsibilities**
 - **Procurement**
 - **Site One**
 - **Quality**
 - **Telecommunications**
- **Follow-up actions to address other organizations**
- **Organizational interfaces routinely demonstrated (drills/exercises)**

Are there structures/personnel for which inadequate notification methods exist?

- **Re-evaluating notification methods previously considered acceptable**
- **First priority in this has been consideration of routinely occupied structures**
- **Mail-out instruction to department managers emphasizes responsibilities for emergency notification**

Are drills conducted on major elements of the Emergency Plan every 6 years?

- **Compared NUREG 0654 to the Six Year Plan**
- **Six Year Plan**
 - **All elements verified complete**
- **NUREG 0654**
 - **Two elements not fully demonstrated**
 - **Exclusion Area evacuation/assembly at ENOC**
 - **Evacuation/relocation of Emergency Response Facilities**

Are there problems tracking and repairing inoperable emergency equipment?

- **Two additional instances of concern:**
 - **TSC Iodine Monitor**
 - **Stack Monitor**
- **Industry benchmarking to evaluate methods for strengthening our process**

Is the equipment testing program comprehensive?

- **Self assessment to evaluate testing adequacy (equipment/frequency)**
 - **EPIP 13.14.4 (Emergency Equipment)**
 - **Required testing driven by Work Orders (PASSPORT) or Plant Tracking Log (PTL)**
 - **One deficiency identified (PTL existed but no 13.14.4 requirement)**

Is the training program sufficiently comprehensive?

- **Quality review to assess knowledge**
- **EP review of existing training materials**
 - **General Employee Training (GET) revision**
 - **“Blue Badge” training module development**
 - **EP module in new employee orientation**

Is the independent oversight program sufficiently comprehensive?

- **Performance Self Assessment (PSA) focus area (Continuous Improvement)**
- **Quality Program review and plan for excellence**
- **Reinforced management expectations**
- **Independent Senior manager review**

Measures of Effectiveness

Measures of Effectiveness

- **Annual assessment of Emergency Plan implementation at Site One will be performed by EP**
- **Annual Quality Assurance audit of EP to include evaluation of Emergency Plan implementation within the OCA**
- **Effectiveness of program improvements to be demonstrated by drills/exercises**
- **Use of Corrective Program for trending**
- **Use of Performance Indicators for trending/detecting degraded performance**