

February 21, 2002
GO2-02-027

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
CLARIFICATION AND RESPONSE REGARDING NRC INSPECTION
REPORT 50-397/01-008 AND FINAL SIGNIFICANCE DETERMINATION
LETTER**

- 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)"
- 3) Letter dated January 28, 2002, RL Webring (Energy Northwest) to NRC, "Reply to Final Significance and Determination For a Yellow Finding and Notice of Violation (NRC Inspection Report 50-397/01-008)"

We recently provided a reply to a Notice of Violation (Reference 3) regarding emergency preparedness at Columbia Generating Station. I want to emphasize again that we acknowledge that our responsiveness and aggressiveness were less than adequate in addressing concerns identified by Washington state representatives and the NRC staff. In addition, I want to take this opportunity to reassure you that we will improve our communications regarding NRC and Washington state identified concerns that involve operation of the Columbia Generating Station.

However, the above referenced inspection report (Reference 1) and NRC letter (Reference 2) include information that does not accurately describe or reflect procedures, processes and programs that were in place at Columbia Generating Station prior and during the period described in the inspection report and letter. The purpose of this letter is to provide information to ensure the licensing basis for Columbia Generating Station remains accurate.

Information included in Attachment A discusses statements in Reference 1. Information included in Attachment B discusses statements in Reference 2.

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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

Attachments

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

CLARIFICATION AND RESPONSE REGARDING NRC INSPECTION REPORT 50-397/01-008 AND FINAL SIGNIFICANCE DETERMINATION LETTER

Attachment A

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The sole purpose of this attachment is to identify statements in NRC Inspection Report Number 50-397/01-008 that are not accurate and to provide an accurate record regarding each statement. This attachment addresses the features of the Columbia Generating Station emergency plan or procedures that were in place during the period from October 14, 1997, to July 23, 2001.

1. Report statement:

Siren could not be reliably heard inside the protected area. [page 2]

Response:

The crossroads siren could be reliably heard in outdoor locations within the Columbia Generating Station protected area. The crossroads siren could not be reliably heard in indoor locations within the Columbia Generating Station protected area.

2. Report statement:

Licensee procedures did not require testing of the onsite notification siren system. [page 2]

Response:

The NRC statement is incorrect in that the Columbia Generating Station does not use a siren for protected area notification. The Columbia Generating Station has a siren used for emergency notification of the Site One portion of the exclusion area. This siren is tested by procedure. This siren is referred to as the "crossroads" siren or more formally in procedures as the W-1 siren. The following procedures implement the testing.

Crossroads Siren Surveillances

Surveillance	Frequency	Description
<u>TSI 6.2.25</u> Crossroads Siren Polling Test	Weekly	Verifies operation of telemetry link between SCC and siren. (The siren is not sounded)
<u>TSI 6.2.23</u> Crossroads (W1)	Twice per year	Siren-Battery Load Test and Remote Activation
<u>TSI 6.2.27</u> FCC Equipment Operational Tests	Annually	Annual transmitter on-frequency
<u>EPIP 13.14.4 Attachment 5.5</u> Emergency Equipment	Annually	Full operational test (Crossroads and Site One sirens are sounded)

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3. Report statement:

Tests were generally performed on the “crossroad” siren, but were not documented. [page 2]

Response:

The results of the weekly, semi-annual and annual test of the crossroads siren, noted in statement 2 above, are documented.

4. Report statement:

The licensee’s method for performing silent siren tests of the “crossroad” siren did not provide positive indication of siren operability. [page 2]

Response:

This statement is accurate regarding silent testing of the crossroads siren. However, it is not complete regarding testing of the crossroads siren. Other procedures required annual testing of the crossroads siren and provided full activation of the siren. See the table in response to statement 2 above.

5. Report statement:

However, this procedure [to notify the WNP-1 designated site authority] was assigned to an emergency operations facility responder which introduced an hour or more delay in its completion. [page 2]

Response:

The delay identified as an hour or more does not exist. The Columbia Generating Station procedures require the Security Communication Center to directly notify (among others) the Site One designated site authority (DSA) at an Alert classification, or above, if the emergency operations facility responder (Offsite Agency Coordinator) has not arrived at the emergency operations facility. The turnover action is included in a procedure.

EPIP 13.4.1, Section 5.6. “Notifications made by the Security Communications Center (SCC)”

Step 5.6.9. For initial or fast breaking classifications where the Offsite Agency Coordinator has not yet arrived at the EOF to take over Part C notifications (Attachment 6.1) ... contact the listed agencies in the Part C notification list...

Attachment 6.1 Emergency Notification Lists, Part C Emergency Notification List (Contd.)

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At Alert or Above

4. *WNP-1 Site Security (or designated WNP-1 site authority)*
5. *[Supply System] Visitor's Center*
6. *Security Training Facility*
7. *Maintenance Training Facility*
8. *Institute of Nuclear Power Operations (INPO)*
9. *American Nuclear Insurer (ANI)*

Step 5.6.10 Each time the classification is changed, and the Emergency Director function is still in the Control Room, cease notification sequence and start over from step 5.5.1.

Step 5.6.11 When contacted by the Offsite Agency Coordinator in the EOF, turn over responsibility for Part C Offsite Support Agency Notifications.

6. Report statement:

There was an inconsistency between the emergency plan and the implementing procedures regarding the requirement to conduct an evacuation. [page 3]

Response:

The Columbia Generating Station Emergency Plan provides for the evacuation of the exclusion area as needed at a Site Area Emergency. Procedures include the option and guidance to use to make a decision if exclusion area evacuation should be ordered at a Site Area Emergency. The following section outlines the Columbia Generating Station Emergency Plan and the applicable procedures:

Emergency Plan, Section 5.7.3, Plant and Nearby Facilities Evacuation

Non-essential personnel in the Exclusion Area will be evacuated as needed at a Site Area Emergency or General Emergency

EPIP 13.5.3, Section 4.1.1, Emergency Director Responsibilities

Determine the need for an Exclusion Area Evacuation at Site Area Emergency.

EPIP 13.5.3, Section 2.2

The Emergency Director is responsible for determining when an Exclusion Area evacuation should be conducted. The decision to evacuate personnel should be based on the course of action presenting the minimum risk to employees.

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Some examples of conditions which make an Exclusion Area evacuation not advisable include, but are not limited to:

- *An ongoing security threat affecting personnel in the Exclusion Area (consult with the Security manager to aid in determining the safest course of action)*
- *Inclement weather (e.g. high winds or hazardous road conditions may preclude a safe evacuation of personnel)*
- *Radiological hazards exist (determine which action would result in lowest dose to evacuating personnel)*
- *Other hazards exist which might subject evacuees to a higher risk to personnel safety than not evacuating.*

If conditions for an Exclusion Area evacuation are present, but the decision is made to not evacuate personnel due to safety concerns, personnel will normally remain at their work locations unless directed otherwise.

EPIP 13.5.3, Section 2.3

Normally, Exclusion Area evacuations will be considered at a Site Area Emergency, or when other conditions warrant and is an automatic action at General Emergency.

7. Report statement:

The licensee also lacked methods for directing lessees to alternate locations. [page 4]

Response:

Methods did exist. The specific applicability of each of these methods is provided in the table on page 5 for each lessee.

[EPIP 13.5.3, Section 4.1.3]

If the decision is made to evacuate the Exclusion Area, determine if radiological hazards exist or are suspected within the Exclusion Area. If a radiological hazard does exist or a release is in progress, then direct evacuees to report to the ENOC assembly area. Determine safe evacuation routes and hazardous areas to avoid.

[EPIP 13.10.8, Section 3.1.13.e]

Direct evacuees, and those evacuees that may be contaminated, to report to the assembly area for accountability and personnel monitoring.

[WNP-1 Construction Site Emergency Evacuation & Response Plan]

All personnel are directed to go home unless directed to an assembly area by a security officer at the roadblock.

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Current Lessees as of 4/1/2001			Communication means for each lessee Notification						
			Bldg Page	Call Tree	Power Block Page	DSA Sweep	Security Sweep	Peer To Peer	Road Block
Lessee	Building	Lease Period							
TARC	4, 242, 252	9/00 - Current	1	9		3	4	6	7
CREHST Museum	55	6/98 - Current		2		3	4	6	7
Durametal	2, 4	2/98 - Current		2		3	4	6	7
Master-Lee	74	10/97 - Current		2		3	4	6	7
Tri-City Railroad 8	Track	8/00 - Current		8		3	4	6	7
Existed During 10/97-4/01									
CWT Technologies	1	1/98 - 10/99	1	2		3	4	6	7
Exitech 8	211	11/97 - 4/98		8		3	4	6	7
Fluor Hanford 8	211	2/00 - 11/00		8		3	4	6	7
IET, Inc.	TGB	11/98 - 4/01		2	5	3	4	6	7
Lampson 8	250	1/01 - 6/01		8		3	4	6	7
Code	Description								
1	Building 4 office and Building 1								
2	Notification by telephone call tree on Site One								
3	Normal Working Hours only, unless DSA mobilizes at Alert								
4	Notification by sweep								
5	Will notify all persons in the power block								
6	A peer to peer notification is expected by the lessee and lessee employees								
7	Roadblock was the final backstop for providing route and monitoring direction								
8	Short term storage-only contracts and infrequent occupancy, no onsite telephone								
9	Located in same building as Energy Northwest Site One staff								

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8. Report statement:

In later discussions, [Columbia Emergency Planning] staff stated that security would perform visual checks during an exclusion area evacuation but that active measures, such as knocking on the doors of lessee buildings, would not be performed. [page 2]

Response:

This statement seems to be taken out of context. Columbia Generating Station emergency planning personnel were responding to a question by stating that the security patrol would not automatically knock on doors or enter lessee buildings rather that security would not take active measures. The direction provided by the procedures is to evacuate the exclusion area. The specificity of how to conduct the sweep was not included in the implementing procedures. The level of specificity was not considered necessary due to the skill of security personnel.

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Attachment B

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The sole purpose of this attachment is to identify statements in the NRC letter noted in Reference 2 and associated with a final significance determination regarding a finding at the Columbia Generating Station. This attachment addresses the features of the Columbia Generating Station emergency plan or procedures that were in place during the period from October 14, 1997, to July 23, 2001.

1. Letter statement:

The other notification processes (Gaitronics, plant paging system, and Energy Northwest radio systems) did not apply to lessees. [page 2]

Response:

This statement is not accurate in that some lessees were within the areas serviced by these systems. Specifically, IET occupied a portion of the WNP-1 turbine building (11/98 through 4/01). Additionally, the building paging system (accessible for paging from any Energy Northwest extension) was available to notify two lessees: Tri-Cities Asset Reinvestment Company, LLC, (9/00 to present) and CWT Technologies (1/98 through 10/99).

2. Letter statement:

The Designated Site Authority call-tree system was not proceduralized and was flawed because it relied on someone answering a specific telephone in the lessee's office. [page 3]

Response:

Energy Northwest will continue to rely on the telephone call-tree as one of the means of notification to meet the requirements of 10CFR50.47(b)(10). However, the telephone is not the only means used as a notification tool.

3. Letter statement:

The WNP-1 Construction Site Emergency Evacuation and Response Plan did not address radiological monitoring for any exclusion area evacuees. [page 4]

Response:

The WNP-1 Construction Site Emergency and Response plan included a provision for evacuees to go to an assembly area as directed by a security officer. Specifically, page 12 of the plan states: "All personnel are directed to go home unless directed to an assembly area by a Security officer at the roadblock." This feature was specifically intended to address the condition where the protective action for the evacuee was to be told to go to the ENOC for monitoring.

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4. Letter statement:

There were circumstances under which a roadblock by site security personnel would not be established on plant access roads, such as a radiological release in that direction. [page 3]

Response:

Procedures provide for the establishment of a roadblock on the Site One access road. Procedures also provide for the relocation of the roadblock on the Site One access road. The purpose of the relocation feature is to provide a measure of protection for the person stationed at the roadblock in the event of a potential or actual radiological release coupled with meteorological conditions (wind direction) that would make the conditions at the original roadblock position a greater hazard than at the relocated roadblock position.

5. Letter statement:

The CGS emergency response organization was not trained about the presence of lessees in the exclusion area and therefore could have been unaware of a need to direct them to the Energy Northwest Office Complex for monitoring, and to monitor and decontaminate them once they arrived at the assembly location. [page 4]

Response:

The statement is correct in that formal training was not provided. The statement is incorrect in that the statement infers that a lessee evacuated and responding to the Energy Northwest Office Complex for monitoring and decontamination would be refused access. Energy Northwest is unaware of any foundation for such a statement, and therefore concludes that it is overly speculative. This is conjecture that the lessees would not be evacuated because the Emergency Director would not be aware of the need to evacuate them because he did not know they were there. This assumes that when he/she orders the exclusion area evacuated, that the implementing organizations (WNP-1 Emergency Team and Security) would ignore them. This portion of the statement is negated by the fact that Energy Northwest not only established contract provisions to require evacuation, had call-trees that include the lessees, and also referenced lessees in the WNP-1 Emergency plan.