

April 28, 2004
GO2-04-083

SAFEGUARDS INFORMATION

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

Subject: **COLUMBIA GENERATING STATION, DOCKET NO. 50-397;
SUPPLEMENTAL RESPONSE TO THE APRIL 29, 2003, ORDERS TO
COLUMBIA GENERATING STATION**

Dear Sir or Madam:

The NRC issued an Order dated April 29, 2003, Requiring Compliance with Revised Design Basis Threat ("Order EA-03-086 or Order") and other security related Orders (collectively "Orders") for the Columbia Generating Station. This Supplemental Response of Energy Northwest to Order EA-03-086 supplements the previous response dated June 3, 2003, that Energy Northwest filed pursuant to 10 CFR § 50.4 and section III, Conditions A.1, B.1, and B.2.

Order EA-03-086 imposes license conditions on nuclear power plants licensed pursuant to the Atomic Energy Act of 1954 and Title 10 of the Code of Federal Regulations. Section III.A of the Order requires licensees to revise their physical security plans and safeguards contingency plans to provide protection against the revised design basis threat (DBT) set forth in Attachment 2 to the Order. Section III.A also requires licensees to revise the security force training and qualification plan to implement the revised DBT. These revised plans, along with an implementation schedule, were required to be submitted to the Commission for review and approval no later than April 29, 2004.

**NOTE: ATTACHMENTS A & C TO THIS LETTER CONTAIN "SAFEGUARDS
INFORMATION" AND MUST BE PROTECTED ACCORDINGLY. UPON
SEPARATION OF ATTACHMENTS A & C , THIS LETTER AND
ATTACHMENTS B & D ARE
"DECONTROLLED"**

SAFEGUARDS INFORMATION

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In accordance with the Order and 10 CFR § 50.4, Energy Northwest is submitting this Supplemental Response for the above-mentioned licensed facility. This submittal includes, as Attachment A, revisions to the Columbia Generating Station Physical Security Plan, the Contingency Plan, and the Training and Qualification Plan as required by Order EA-03-086. These plans contain the integrated commitments to comply with Order EA-03-086 and the other security related Orders issued on February 25, 2002, January 7, 2003, and April 29, 2003. As a result, these plans supercede previous submittals of Energy Northwest in these areas, including those related to the February 25, 2002, January 7, 2003, and April 29, 2003, Orders. Energy Northwest will continue to implement the provisions of those previous submittals except to the extent that they are superseded by these plans. All changes that have been or will be made have been evaluated to ensure that they do not compromise plant safety.

Energy Northwest has developed these plans to be consistent with NEI-03-01 (Revision 1), Nuclear Power Plant Access Authorization Program (April 2004); NEI-03-09 (Revision 2 (draft)), Security Officer Training Program (April 2004); and NEI-03-12 (Revision 2 (draft)), Template for the Security Plan, Training and Qualification Plan, Safeguards Contingency Plan, and Independent Spent Fuel Storage Installation Security Program (April 2004). The schedule for completing those actions, which includes the identification of major transitional activities, is provided in Attachment B to this submittal. To facilitate the NRC review, any provisions that are different from NEI-03-12 are identified and the justification provided in Attachment C, Deviations from NEI-03-12, to this submittal. Attachment D, Previous Exemptions to 10 CFR Part 73, is a listing of any exemptions to 10 CFR Part 73 previously granted to Energy Northwest and an explanation of their status under the plans hereby submitted. Energy Northwest is not considering adopting any of the alternatives provided in NEI-03-12 or in "NRC Guidance on Implementation of the April 2003 Revised Design Basis Threat." Energy Northwest has chosen to implement Option 2 of NEI-03-12, Section 9.4.1.2.

When the NRC approves the final revision of NEI-03-12, Energy Northwest will supplement this response, if necessary, to conform to NEI-03-12 as finally approved. However, with the filing of these plans, Energy Northwest will be implementing its revised protection strategy and completing plant modifications and security personnel training pursuant to these plans to ensure that implementation will be completed by October 29, 2004, as required by the Orders. Upon completion of the implementation of these plans, Energy Northwest will be in compliance with all applicable security requirements. For the purpose of complying with the requirements of 10 CFR Part 73 to conduct an annual audit, the date of the letter that will be submitted to the NRC pursuant to Order EA-03-086 certifying that implementation of the plans is complete will be the effective date for determining commencement of the annual audit requirement period.

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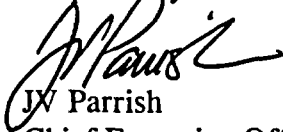
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Because of the requirement for these plans to be fully implemented by October 29, 2004; the need to integrate the requirement of the revised DBT Order with the Orders issued February 25, 2002, January 7, 2003, and April 29, 2003; and the Commission's determination that it would be appropriate to exercise enforcement discretion to accommodate any transitional issues which may arise as licensees, in good faith, take reasonable actions to implement the specific requirements of the Orders, Energy Northwest requests that enforcement discretion be exercised during the transition period until full implementation of the plans is accomplished and the physical plant modifications and security force training are complete. At that time, the revised plans will be fully implemented and the exercise of enforcement discretion will no longer be necessary.

In accordance with 10 CFR § 2.202(b), the following affirmation is provided:

I, JV Parrish, being duly sworn, subscribe to and say that I am the Chief Executive Officer for ENERGY NORTHWEST, the applicant herein; that I have the full authority to execute this oath; that I have reviewed the foregoing; and that to the best of my knowledge, information, and belief that the statements made in it are true.

Respectfully submitted,



JV Parrish
Chief Executive Officer

Sworn to and subscribed before me this 28 day of April, 2004.



Notary Public

My Commission expires: 3-29-05



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The attachments to this letter are provided on CD-ROM. Information regarding the CD is provided on the following page in accordance with the NRC's Guidance for Electronic Submissions to the Commission (Federal Register Notice, 68 FR 58792, dated October 10, 2003).

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

Respectfully,



JV Parrish
Chief Executive Officer
Mail Drop 1023

Attachment A: Revisions to the Columbia Generating Station Physical Security Plan, the Safeguards Contingency Plan, and the Training and Qualification Plan as required by Order EA-03-086.

Attachment B: Schedule for Completing Plant Modifications, Security Personnel Training, and Major Transitional Activities as Required by the Orders.

Attachment C: Deviations from NEI-03-12.

Attachment D: Previous Exemptions to 10 CFR § 73

cc: BS Mallet - NRC - RIV w/o
WA Macon - NRC - NRR w/o
NRC Sr. Resident Inspector - 988C w/o
RN Sherman - BPA/1399 w/o
TC Poindexter - Winston & Strawn w/o

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CD-ROM TRANSMITTAL INFORMATION

Contact Information:

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A total of one (1) CD-ROM is included in the submission. The CD-ROM labeled "Supplemental Response to April 29, 2003, Orders to Columbia Generating Station-Safeguards Information" contains the following five (5) files:

001 Transmittal Letter.pdf, 129,724 bytes, publicly available
002 Attachment A Physical Security Plan.pdf, 1,051,332 bytes, safeguards information
003 Attachment B Schedule Completing Actions.pdf, 51,897 bytes
004 Attachment C NEI-03-12 Deviations.pdf, 85,175 bytes, safeguards information
005 Attachment D Previous Exemptions 10CFR73.pdf, 51,294 bytes