

May 27, 2004  
GO2-04-103

**SAFEGUARDS INFORMATION**

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

Subject: **COLUMBIA GENERATING STATION, DOCKET NO. 50-397;  
JUSTIFICATIONS ON THE USE OF ALTERNATIVE MEASURES FOR  
COMPLIANCE WITH 10 CFR § 73.55**

Reference: Letter dated April 28, 2004; JV Parrish (Energy Northwest) to NRC,  
"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. Attachment A of the referenced letter contains 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.

Sections 9.5 and 10.1 of Attachment A to the referenced letter discussed alternative means for compliance with particular paragraphs of 10 CFR § 73.55. Justification establishing the equivalency of these alternatives is provided in the Attachments herein at the request of the Staff reviewing Attachment A of the referenced letter.

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

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Page 2 of 3

These justifications are consistent with guidance templates provided by the Nuclear Energy Institute.

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 27, 2004.

Should you have any questions or require additional information, please contact DW Coleman at (509) 377-4342.

Respectfully,



DK Atkinson  
Vice President, Technical Services  
Mail Drop PE08

Attachment A: Evaluation For Determining Equivalency of Alternative Method of Compliance with 10 CFR § 73.55(d)(4).

Attachment B: Evaluation For Determining Equivalency of Alternative Method of Compliance with 10 CFR § 73.55(c)(5).

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  
SA Morris - NRC - NSIR w/o  
AL Silvius - NRC - NSIR w/o  
LH Grosman - NRC - OCIO w/o  
J Davis - NEI w/o

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).

**JUSTIFICATIONS ON THE USE OF ALTERNATIVE MEASURES FOR  
COMPLIANCE WITH 10 CFR § 73.55**

Page 3 of 3

**CD-ROM TRANSMITTAL INFORMATION**

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A total of one (1) CD-ROM is included in the submittal. The CD-ROM labeled "Clarifications on the Use of Alternative Measures For Compliance with 10 CFR § 73.55" contains the following three (3) files:

001 Transmittal Letter.pdf, 155,525 bytes, publicly available  
002 Attachment A, Alternative for § 73.55(d)(4).pdf, 114,849 bytes, safeguards information  
003 Attachment B, Alternative for § 73.55(c)(5).pdf, 105,573 bytes, safeguards information