

June 2, 2004

Mr. J. V. Parrish
Chief Executive Officer
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P.O. Box 968 (Mail Drop 1023)
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SUBJECT: COLUMBIA GENERATING STATION - REQUEST FOR ADDITIONAL
INFORMATION RELATED TO REQUEST FOR EMERGENCY PLAN CHANGE
(TAC NO. MC3048)

Dear Mr. Parrish:

By letter dated April 22, 2004, Energy Northwest submitted a proposed change to the Columbia Generating Station Emergency Plan. This change requests an extension to the time goal for the emergency response organization to respond and activate the Emergency Response Facilities in the event of an emergency.

The staff has completed its preliminary review of this submittal and has determined it needs additional information to complete the review. Our request for additional information is enclosed. This request was discussed with Christina Perino of your staff and it was agreed that a response would be provided by June 30, 2004.

Sincerely,

/RA/

William A. Macon, Project Manager, Section 2
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-397

Enclosure: Request for Additional Information

cc w/encl: See next page

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Columbia Generating Station

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REQUEST FOR ADDITIONAL INFORMATION

ENERGY NORTHWEST

COLUMBIA GENERATING STATION

DOCKET NO. 50-397

By letter dated April 22, 2004 (Accession No. ML041250414), Energy Northwest submitted proposed changes to the Columbia Generating Station Emergency Plan Section 2.3 (Emergency Response Organization), Section 2.3.3 (Essential Emergency Operations Facility Emergency Organization), Section 5.4.1 (Environmental Field Teams) and Table 2-1 (ERO Minimum Staffing Requirements). This proposed change requests NRC approval for a change from one hour to 90 minutes for the Emergency Response Organization (ERO) to respond and activate site facilities in the event of an emergency.

The NRC staff requests the following information related to this submittal.

1. The proposed change to Section 2.3 (2nd paragraph, 2nd sentence) states, "Those members of the ERO that are not on site at the time of the emergency will be able to respond within about 90 minutes of the emergency." The application cover letter requests an extension to the time goal for "...the emergency response organization to respond *and activate Emergency Response Facilities (ERFs)*..." within about 90 minutes of classification of an Alert or higher classification per change description in Attachment 4 (italics added). Provide change to Section 2.3 to address statement in the application cover letter. In addition, describe the actions that are required to declare a facility activated.
2. Provide a copy of Table 2-1 or equivalent, which illustrates the ERO minimum staffing levels originally approved by the NRC as part of initial plant licensing. In addition, provide a description of all subsequent changes to Table 2-1 or equivalent, and indicate whether those changes were implemented under 10 CFR 50.54(q), as not constituting a decrease in effectiveness, and those receiving Commission approval prior to implementation. Specifically address the Emergency Plan (E-Plan) review and approval process used for the insertion of footnote 1 in Attachment 2 comparison and E-Plan Table 2-1, which states that the Control Room Supervisor and Shift Technical Advisor (STA) positions are not required to be staffed in Modes 1, 2 and 3 for E-Plan response purposes.
3. In Attachment 1, under justification for proposed change #1 (4th and 5th paragraphs), the licensee states that "Energy Northwest maintains multiple ERO teams with one complete team being on-duty/on-call at any given time," and outlines response expectations for ERO personnel. However, these ERO expectations are not clearly outlined in either Sections 2.3 or 4.6.1 (Energy Northwest Emergency Organization Notification). Provide the proposed change to the appropriate section(s) to the E-Plan to address ERO response expectations as outlined in Attachment 1.

4. In Attachment 1, under justification for proposed change #2, the licensee states in the OPERATIONS discussion (1st paragraph), that "In accordance with the E-Plan, on-shift staffing is in excess of the requirements of NUREG-0654 Table B-1 (see Attachment 2)..." However, upon review of "Operations" positions under the GROUP Column, on-shift Operations staffing appears to be consistent with, and not in excess of, the staffing guidance in NUREG-0654 Table B-1. Provide the rationale for the apparent inconsistency.
5. In Attachment 1, under justification for proposed change #2, the licensee states in the OPERATIONS discussion (2nd paragraph) that "Senior Reactor Operators (SROs) are trained to perform dose assessment." However, E-Plan Section 2.3.1.1 (Shift Manager), under Attachment 4, states that "The Senior Reactor Operator (SRO) license holders on shift *and the STAs* are available to perform offsite dose assessment at all times when required" (italics added). Clarify the apparent discrepancy between Attachments 1 and 4 regarding which on-shift personnel are qualified to perform dose assessment. In addition, provide the change(s) to Section 2.3.1 of the E-Plan to clearly identify the on-shift responsibility for performing dose projections, if warranted.
6. Describe the on-shift positions or disciplines that are used to meet station fire brigade requirements, and clarify whether these individuals may be assigned any collateral E-Plan functions.
7. In Attachment 1, under justification for proposed change #2, the licensee only addresses the Emergency Notification System (ENS) Communicator in the COMMUNICATOR discussion. Clarify the purpose of the Security Communication Center (SSC) Duty Officer and Security Responder in support of on-shift notifications/communications, specifically as related to the notification of State and local agencies and ERO personnel.
8. Attachment 2 comparison and E-Plan Table 2-1 (Attachment 4) list the Telecom Manager (EOF) and Plant/NRC Liaison as augmenting the notification/communications function. E-Plan Section 2.3.2.3 currently describes the duties of the Technical Support Center (TSC) Plant/NRC Liaison as being responsible for communications with the NRC via the ENS circuit and activation of the Emergency Response Data System (ERDS). E-Plan Section 2.3.3.5 currently describes the duties of the EOF Telecommunications Manager as ensuring the operability of the communications systems, but does not define specific notifications/communications duties. Discuss the apparent discrepancy among E-Plan Sections 2.3.2 and 2.3.3, and Table 2-1, to clearly describe the positions assigned responsibility for the notification of and communication with State and local agencies from the TSC and EOF, and provide proposed E-Plan change(s) to address. In addition, clarify whether a position(s) is currently designated in the EOF for continuing communications with the NRC regarding offsite environmental and protective action activities and decisions.
9. In Attachment 1, under justification for proposed change #2, the licensee identifies in the RADIATION PROTECTION AND CHEMISTRY discussion (3rd paragraph), the use of the Quick Emergency Dose Projection System (QEDPS). Describe the QEDPS design time goal for performing a rapid dose assessment and whether QEDPS has an automatic data feed/link to assist in expediting projection. In addition, describe any

differences in dose projections to be performed by on-shift personnel in the control room using QEDPS and detailed projections performed by EOF staff upon facility activation.

10. The current E-Plan Table 2-1 identifies three Health Physics (HP) Technicians on-shift (1 - in plant surveys / 2 - protective actions), with Environmental Field Teams provided under ERO augmentation. Describe the capabilities of on-shift HP technicians to detect an unmonitored release prior to the mobilization of the Environmental Field Teams.
11. Describe on-shift capabilities for performing core/thermal hydraulic (core damage) technical support prior to the activation of the TSC. In addition, provide the change(s) to Section 2.3.1 of the E-Plan to clearly identify on-shift responsibility for performing initial core/thermal hydraulic (core damage) technical support.
12. In Attachment 1, under justification for proposed change #2, the licensee states in the MAINTENANCE discussion that "Until the reactor is stabilized and the causal agents discerned, actual repairs or realignment of plant equipment would not require large-scale support...Therefore, extending the response time goals for augmenting personnel from 60 minutes to 90 minutes will not adversely affect the ability of the on-shift personnel to manage the initial stages of an emergency." The probabilistic risk assessment (PRA) evaluation in Attachment 3 is provided to support this assumption.¹ However, current NRC guidance in Section III.C to NUREG-0396² states that the subsequent time period over which radioactive material may be expected to be released is of the order of 30 minutes for a short-term release. Therefore, describe what other on-shift resources that are in place, above the existing collateral repair and corrective action assignments currently described in E-Plan Table 2-1, or proposed to ensure that electrical maintenance / instrument and control actions can be initiated, if warranted, within 90 minutes of event declaration (prior to ERO augmentation). For example, additional Equipment Operators on-shift and cross-trained in maintenance activities, additional maintenance staff on-shift but not identified on Table 2-1, etc. which would meet or provide an acceptable alternative to the 30-minute augmentation guidance in NUREG-0654 Table B-1³.

¹ While the Commission recognizes risk analysis as important for risk-informing the regulatory process, it has also articulated the need for defense-in-depth. Essentially, defense-in-depth adds safety margin with regard to protection of the public health and safety in the unlikely event of a serious accident. Emergency planning is cited as an aspect of defense-in-depth. The Commission Policy Statement, entitled Safety Goals for the Operation of Nuclear Power Plants, states: "The Commission recognizes the importance of mitigating the consequences of a core-melt accident and continues to emphasize features such as containment, siting in less populated areas, and emergency planning as integral parts of the defense-in-depth concept associated with its accident prevention and mitigation philosophy." The Policy goes on to state: "A defense-in-depth approach has been mandated in order to prevent accidents from happening and to mitigate their consequences. Siting in less populated areas is emphasized. Furthermore, emergency response capabilities are mandated to provide additional defense-in-depth protection to the surrounding population."

² NUREG-0396 (EPA-520/1-78-016), "Planning Basis for the Development of State and Local Government Radiological Emergency Response Plans in Support of Light Water Nuclear Power Plants", December 1978

³ River Bend staffing change (ML012710218), referenced in application, provides for an additional 2 on-shift Equipment Operators (total of 4 on-shift), 1 on-shift mechanical maintenance (without collateral duties), and 2 on-shift electrical maintenance / I&C (without collateral duties).