

May 31, 2005
GO2-05-098

SAFEGUARDS INFORMATION

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
11555 Rockville Pike
Rockville, Maryland 20852

Subject: **COLUMBIA GENERATING STATION, DOCKET NO. 50-397;
RESPONSE TO NRC GUIDANCE REGARDING MITIGATION
STRATEGIES**

Dear Sir or Madam:

The NRC issued Orders For Interim Safeguards and Security Compensatory Measures ("Order EA-02-026" or "ICM Order") dated February 25, 2002, for Energy Northwest's Columbia Generating Station ("Columbia").

Order EA-02-026 imposed requirements 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 required licensees to implement certain changes in physical security plans and safeguards contingency plans on an interim basis until final requirements were established. Among other requirements, Energy Northwest was required to complete implementation of the requirements of Section II.B.5.b of Order EA-02-026 by August 31, 2002.

Subsequently, the NRC issued Orders, dated April 29, 2003, requiring compliance with the revised Design Basis Threat for Operating Power Reactors ("Order EA-03-086" or "DBT Order") and other security related Orders (collectively "Orders") for Energy Northwest. In many ways, Order EA-03-086 complemented or superseded the interim measures imposed by Order EA-02-026.

ATTACHMENT 1 CONTAINS SAFEGUARDS INFORMATION AS DEFINED BY 10 CFR 73.21. UPON SEPARATION FROM THE ATTACHED SAFEGUARDS INFORMATION, THIS TRANSMITTAL DOCUMENT SHALL BE DE-CONTROLLED.

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As required by Order EA-03-086, the plans for Columbia have been implemented. Subsequently, Energy Northwest was requested to respond to the letter from J.E. Dyer, Director, Office of Nuclear Reactor Regulation, dated February 25, 2005, *NRC Staff Guidance for Use in Achieving Satisfactory Compliance with February 25, 2002, Order Section B.5.b*, ("NRC B.5.b. Guidance"), by May 31, 2005, and to implement appropriate enhancement to current mitigation strategies by August 31, 2005. Specifically, nuclear power plant licensees were requested by Enclosure 2, *Developing Mitigating Strategies / Guidance for Nuclear Power Plants to Respond to Loss of Large Areas of the Plant in Accordance with B.5.b of the February 25, 2002, Order* (dated February 24, 2005) ("NRC B.5.b. Guidance"), to the February 25, 2005, letter to review the Areas of Consideration delineated in Attachment A to that Enclosure and evaluate additional considerations for potential inclusion in the licensees' mitigating strategies that licensees deemed appropriate in accordance to Attachment B to that Enclosure.

Subsequently, the Nuclear Energy Institute ("NEI"), in conjunction with the NEI Security Working Group, developed and issued guidance for licensee use ("NEI Guidance") to assist licensees in responding to the February 25, 2005, letter.

As requested in the February 25, 2005, letter, Energy Northwest has reviewed the information in Attachments A and B. This review was performed using the NEI Guidance. Attachment 1 provides a summary of a comprehensive and thorough review of the guidance and describes the considerations that Energy Northwest currently has or intends to implement at Columbia by August 31, 2005. The information in Attachment 1 is considered Safeguards Information.

The key principles used in the conduct of this evaluation were (1) whether or not equipment and resources were "readily available," and (2) if equipment is readily available, can it be effectively utilized in a licensee's mitigating strategy. Energy Northwest considers "readily available" to mean that the equipment or resources are already licensee owned, under contract, or part of an existing Memorandum of Understanding. Further, even if equipment and resources are readily available, the second criterion is to ensure that the equipment can be used in a mitigating strategy in an effective manner. Even if the equipment is readily available, it is of no value if it cannot be effective in implementing the mitigating strategy.

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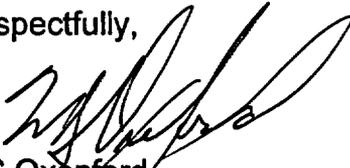
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In accordance with these principles, selected new mitigative strategies are being developed to address the NRC B.5.b. Guidance. These actions, identified in column "G" of Attachment 1, are considered to be commitments for that purpose and will be managed in accordance with Energy Northwest's commitment management system.

Attachment 2 summarizes the status of Energy Northwest's implementation of the B.5.b Guidance. The items shown as open require additional action to complete the implementation of the NRC B.5.b Guidance. These actions will be completed by August 31, 2005.

Respectfully,



WS Oxenford
Vice President, Technical Services
Mail Drop PE04

- Attachments: (1) Energy Northwest's B.5.b Evaluation Summary. [Safeguards Information]
(2) Summary of Items with Open Actions.

cc: BS Mallet - NRC RIV (without attachments)
BJ Benney - NRC NRR (with attachments)
NRC Sr. Resident Inspector - 988C (without attachments)
WA Horin - Winston & Strawn (without attachments)
RN Sherman - BPA/1399 (without attachments)
DJ Walters - Nuclear Energy Institute (with attachments)

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