



**ENERGY  
NORTHWEST**

Sudesh K. Gambhir  
Vice President, Technical Services  
P.O. Box 968, Mail Drop PE04  
Richland, WA 99352-0968  
Ph. 509-377-8313 F. 509-377-2354  
sgambhir@energy-northwest.com

August 17, 2007  
GO2-07-128

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555-001

Subject:

**COLUMBIA GENERATING STATION, DOCKET NO. 50-397  
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION  
RELATED TO REQUEST FOR EMERGENCY PLAN CHANGE**

Sudesh K. Gambhir  
Vice President, Technical Services  
P.O. Box 968, Mail Drop PE04  
Richland, WA 99352-0968  
Ph. 509-377-8313 F. 509-377-2354  
sgambhir@energy-northwest.com

- References: 1) Letter dated April 18, 2007 GO2-07-069, WS Oxenford (Energy Northwest) to NRC, "Request for Emergency Plan Change"
- 2) Letter dated July 13, 2007, CF Lyon (NRC) to JV Parrish (Energy Northwest) "Columbia Generating Station – Request for Additional Information Related to Request for Emergency Plan Change (TAC No. MD5325)"

U.S. Nuclear Regulatory Commission  
Dear Sir or Madam:

ATTN: Document Control Desk  
Washington, D.C. 20555-001

In Reference 1, Energy Northwest submitted a request to change the Columbia Generating Station Emergency Plan (E-Plan). This E-Plan change requested the replacement of the environmental and backup radiological laboratory capabilities in the Emergency Operations Facility (EOF) with the Applied Process Engineering Laboratory (APEL) as the designated backup environmental and radiological laboratory. Following a phone call on June 20, 2007, the NRC requested additional information in Reference 2.

References: 1) Letter dated April 18, 2007 GO2-07-069, WS Oxenford (Energy Northwest) to NRC, "Request for Emergency Plan Change"

2) Letter dated July 13, 2007, CF Lyon (NRC) to JV Parrish (Energy Northwest) "Columbia Generating Station – Request for Additional Information Related to Request for Emergency Plan Change (TAC No. MD5325)"

The requests and the Energy Northwest responses are provided as Attachment 1 to this letter. Attachment 2 contains a clean page of the E-Plan requested in Reference 2.

As discussed with Mr. Carl F. Lyon of the NRC on July 24, 2007, the agreed upon date for a response to Reference 2 is August 17, 2007.

U.S. Nuclear Regulatory Commission  
Dear Sir or Madam:

In Reference 1, Energy Northwest submitted a request to change the Columbia Generating Station Emergency Plan (E-Plan). This E-Plan change requested the replacement of the environmental and backup radiological laboratory capabilities in the Emergency Operations Facility (EOF) with the Applied Process Engineering Laboratory (APEL) as the designated backup environmental and radiological laboratory. Following a phone call on June 20, 2007, the NRC requested additional information in Reference 2.

References: 1) Letter dated April 18, 2007 GO2-07-069, WS Oxenford (Energy Northwest) to NRC, "Request for Emergency Plan Change"

2) Letter dated July 13, 2007, CF Lyon (NRC) to JV Parrish (Energy Northwest) "Columbia Generating Station – Request for Additional Information Related to Request for Emergency Plan Change (TAC No. MD5325)"

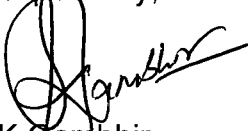
AK45  
NRC

**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION RELATED TO  
REQUEST FOR EMERGENCY PLAN CHANGE**

Page 2

There are no new regulatory commitments contained in this request. Should you have any questions or require additional information regarding this matter, please contact Mr. GV Cullen, Licensing Supervisor, at (509) 377-6105.

Respectfully,



SK Gambhir  
Vice President, Technical Services

Attachments: 1. Response to Request for Additional Information  
2. Clean Emergency Plan Page

cc: BS Mallett – NRC RIV  
CF Lyon – NRC NRR  
NRC Sr. Resident Inspector – 988C  
RN Sherman – BPA – 1399  
WA Horin – Winston & Strawn

## RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION RELATED TO REQUEST FOR EMERGENCY PLAN CHANGE

Attachment 1

Page 1 of 2

### **NRC Questions 1 and 2:**

1. *What differences exist when identifying the capability as: a) backup environmental and radiological laboratory, or b) environmental and backup radiological laboratory?*
2. *Are these both being considered as backup capabilities or only the radiological function?*

### **Energy Northwest's Response:**

As a point of clarification regarding environmental sample analysis, the Washington and Oregon State laboratories are the primary facilities and the APEL facility has the capability to serve as a backup. Currently, the environmental samples are analyzed by the state laboratories. The Emergency Operations Facility (EOF) laboratory was available, but not considered a backup laboratory for environmental field samples in the E-Plan. Following NRC approval, the E-Plan will be clarified to reflect the state laboratories' responsibility as the primary and the APEL facility providing backup capability for environmental sample analysis for Energy Northwest.

With regard to radiological sample analysis, the plant laboratory would continue to be used as the primary facility during an event. The EOF laboratory would have been used if the plant laboratory was unavailable for radiological analyses (i.e., was a backup laboratory). After NRC approval, the plant laboratory will remain as the primary facility and the APEL facility would be used to provide backup capability if the plant laboratory is unavailable for emergency events.

### **NRC Questions 3 and 4:**

3. *Is there written direction that authorized the Applied Process Engineering Laboratory (APEL) to exceed their radioactive materials license verbally?*
4. *If so, who provided this authorization and does a process exist to obtain verbal authorization at any time?*

### **Energy Northwest's Response:**

No written direction exists that pre-authorizes the APEL facility to exceed their radioactive materials license. The Washington State Director of the Office of Radiation Protection has the authorization to approve the APEL facility to exceed the license material limits through normal licensing processes that can be expedited if necessary.

## RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION RELATED TO REQUEST FOR EMERGENCY PLAN CHANGE

Attachment 1

Page 2 of 2

### **NRC Question 5:**

5. *Who is responsible for notifying APEL that their services are required (e.g., though both the states of Washington and Oregon are designated as having laboratory capabilities, Washington State is specifically designated to notify Oregon; Reference Section 4.6.4)?*

### **Energy Northwest's Response:**

The Radiological Emergency Manager would notify the APEL facility. At the declaration of an emergency, the Oregon Emergency Organization is notified by the crash call. Washington State also makes emergency notification to Oregon. At this point Oregon will make any decisions regarding sample collection and analyses.

### **NRC Questions 6 and 7:**

6. *Section 2.2.3 states, in part, that one of the basis functions directed from the Emergency Operating Facility is to coordinate field sampling and analysis of radioactive materials from Columbia Generating Station. How will this be accomplished if the analysis is performed at APEL? Currently, APEL is not staffed 24/7 to support that function.*
7. *What backup environmental and radiological laboratory capabilities are available during non-routine working hours, weekends, and holidays at APEL?*

### **Energy Northwest's Response:**

The EOF will continue to provide the coordination of field sampling and analysis and that function will not be delegated to the APEL staff. The APEL staff has provided contact numbers to Columbia for continuous support. The Emergency Phone Directory contains APEL phone numbers and a 24 hour pager number for the on-call APEL representative.

### **NRC Question 8:**

8. *In the proposed change to Figure 3-1, no mention of the backup environmental laboratory is designated. Please explain.*

### **Energy Northwest's Response:**

This information has been added to the figure, provided in attachment 2.

**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION RELATED TO  
REQUEST FOR EMERGENCY PLAN CHANGE**

Attachment 2

**Clean Emergency Plan Page**

**Figure 3-1, Outside Response Agency Resources**

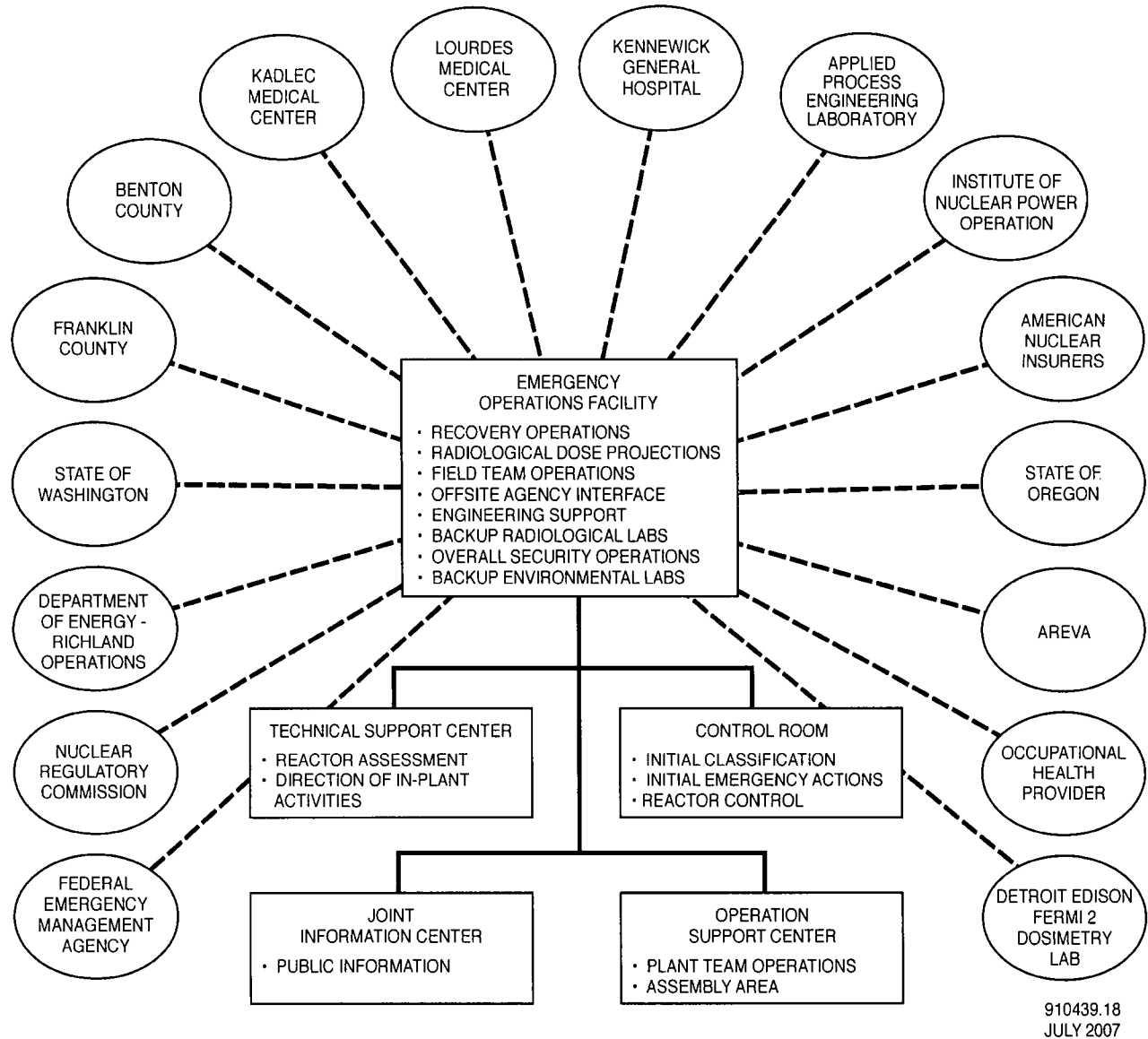


Figure 3-1, Outside Response Agency Resources