

Gregory V. Cullen Regulatory Programs P.O. Box 968, Mail Drop PE20 Richland, WA 99352-0968 Ph. 509-377-6105 F. 509-377-4317 gvcullen@energy-northwest.com

December 11, 2007 GO2-07-172

U. S. Nuclear Regulatory Commission ATTN: Document Control Desk Washington, D.C. 20555-0001

Subject:

COLUMBIA GENERATING STATION, DOCKET NO. 50-397 NOTICE OF MODIFICATIONS TO COMMITMENTS RELATED TO IMPLEMENTATION DETAILS FOR THE PHASE 2 AND 3 MITIGATION **STRATEGIES**

- References: 1) Letter GO2-07-030, dated February 15, 2007, WS Oxenford (Energy Northwest) to NRC, "Response Providing Information Regarding Implementation Details for the Phase 2 and 3 Mitigation Strategies"
 - 2) Letter dated August 9, 2007, CF Lyon (NRC) to JV Parrish (Energy Northwest), "Columbia Generating Station – Conforming License Amendment to Incorporate the Mitigation Strategies Required by Section B.5.b of Commission Order EA-02-026 and the Radiological Protection Mitigation Strategies Required by Commission Order EA-06-137 (TAC NO. MD4521)"

Dear Sir or Madam:

The purpose of this letter is to provide notification that Energy Northwest intends to modify some implementation methods for phase 2 and 3 mitigation strategies described in Reference 1 and approved by the staff in Reference 2. The changes will more effectively implement the strategies and reduce overall cost.

The planned modifications to the implementation methods are consistent with Nuclear Energy Institute (NEI) 06-12, "B.5.b Phase 2 & 3 Submittal Guideline" and will not affect compliance with section B.5.b of Commission Order EA-02-026.

The industry guidance contained in NEI 99-04, Revision 1, "Guidelines for Managing" NRC Commitment Changes" has been applied to these changes and it has been determined that timely notification to NRC is required.

Because some aspects of the changes are under development at this time, complete details will be provided to the staff in a supplement to Reference 1 by January 31, 2008.





NOTICE OF MODIFICATIONS TO COMMITMENTS RELATED TO IMPLEMENTATION DETAILS FOR THE PHASE 2 AND 3 MITIGATION STRATEGIES Page 2

The modifications to the implementation methods will not affect the December 31, 2007 date of compliance with Section B.5.b, Mitigative Measures, of the February 25, 2002 Interim Compensatory Measures Order (EA-02-026) for Columbia Generating Station.

If you have any questions or require additional information, please contact Mr. GV Cullen at (509) 377-6105.

Respectfully,

GV Cullen

Manager, Regulatory Programs

cc: EE Collins, Jr. - NRC RIV

CF Lyon - NRC NRR

NRC Senior Resident Inspector/988C

RN Sherman - BPA/1399

WA Horin - Winston & Strawn