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ENERGY FACILITY SITE EVALUATION COUNCIL

905 Plum Street SE, PO Box 43172 • Olympia, Washington 98504-3172

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April 6, 2010

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75 FR 11572

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Mr. Michael T. Lesar, Chief
Rulemaking and Directives Branch
Office of Administration
Mailstop: TWB 05-B01M
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Subject: Columbia Generating Station License Renewal Application Review

Dear Mr. Lesar:

As Chair of the Washington State Energy Facility Site Evaluation Council (Council or EFSEC), I want to take this opportunity to comment on the application for the renewal of the operating license for the Columbia Generating Station (CGS), an operating nuclear power plant located on the Hanford Site in Benton County, Washington. My understanding is that the U.S. Nuclear Regulatory Commission (NRC) is seeking comments on the CGS renewal application as part of its environmental review in evaluating the impacts of extending the plant's operating license for an additional twenty years through 2043.

In addition to receiving construction and operation license from the NRC, in 1972 the state of Washington issued a Site Certification Agreement (SCA) for the Columbia Generating Station that set out the construction and operation terms and conditions for CGS pursuant to state environmental and public health and safety regulations. EFSEC administers the SCA and has maintained regulatory oversight of the CGS facility/site since construction began in the 1970's and the plant began commercial operations in December 1984.

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SUSE Review Complete
Template - ADM-013

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IN REPLY: LMB-04-001W

Through contracts with key state agencies, the Council monitors environmental and safety aspects of CGS operations that include: radiological monitoring; environmental sampling and data analysis; wastewater discharge and water quality monitoring; sanitary waste treatment and landfill operations; waste disposal operations; building code and fire protection inspections; air emissions monitoring; and wildlife and habitat protection. The Council's ongoing oversight of CGS operations provides assurance that the plant is in compliance with applicable state and federal environmental/safety regulations and the terms and conditions of the SCA.

Throughout CGS's operating life, the plant has maintained an excellent record of compliance with state environmental and safety regulations and SCA requirements. Plant management and staff have always been very responsive in addressing any concerns, and this cooperative partnership has resulted in such matters being satisfactorily resolved. At this time, CGS has no outstanding environmental issues and is considered to be in full compliance with license and permit conditions.

The Council has reviewed the environmental and safety portions of CGS's license renewal application and finds that the impacts associated with extending plant operations are adequately addressed. Three areas of ongoing interest were identified – wastewater discharge under the National Pollutant Discharge Elimination System (NPDES) permit; groundwater discharges; and storage of spent reactor fuel on-site (dry cask storage). These areas are key components of our compliance monitoring program and will continue to receive our full attention throughout the relicensing process.

At an appropriate time in the future, the Council expects to process an amendment to the CGS SCA that will update the plant's licensing requirements should the period of operation be extended to 2043. NRC's licensing decision will be a key component of that review.

The Council wishes to note that Energy Northwest has provided several briefings and routinely reports on the status of the relicensing effort. We also acknowledge that NRC has been in contact with several state agencies with knowledge of CGS activities and received their input as part of your initial scoping review.

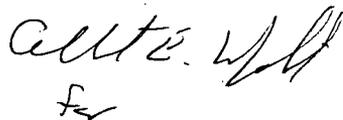
The Council appreciates the opportunity to participate in this relicensing process as the Columbia Generating Station is an integral

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part of the region's power system and a license extension will ensure that the power from CGS is available to future generations.

Thank you for your continued cooperation.

Sincerely,

A handwritten signature in cursive script, appearing to read "James O. Luce".

James O. Luce
Chair