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June 9, 2011  
GO2-11-104

10 CFR 50.54(f)

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

Subject: **COLUMBIA GENERATING STATION, DOCKET NO. 50-397  
30-DAY RESPONSE TO NRC BULLETIN 2011-01, MITIGATING  
STRATEGIES**

References: 1) NRC letter dated May 11, 2011, NRC Bulletin 2011-01, "Mitigating Strategies".

Dear Sir or Madam:

Pursuant to 10 CFR 50.54(f), this letter provides the Energy Northwest 30-day response to NRC Bulletin 2011-01, "Mitigating Strategies," dated May 11, 2011. The bulletin was issued to confirm continued compliance with 10 CFR 50.54(hh)(2) and request information regarding the mitigation strategies program.

The NRC identified the following three objectives:

1. To require that addressees provide a comprehensive verification of their compliance with the regulatory requirements of Title 10 of the Code of Federal Regulations (10 CFR) Section 50.54(hh)(2),
2. To notify addressees about the NRC staff's need for information associated with licensee mitigating strategies under 10 CFR 50.54(hh)(2) in light of the recent events at Japan's Fukushima Daiichi facility in order to determine if 1) additional assessment of program implementation is needed, 2) the current inspection program should be enhanced, or 3) further regulatory action is warranted, and
3. To require that addressees provide a written response to the NRC in accordance with 10 CFR 50.54(f)

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## 30-DAY RESPONSE TO NRC BULLETIN 2011-01, MITIGATING STRATEGIES

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NRC Bulletin 2011-01 requested that within 30 days, licensees submit a response to questions to confirm continued compliance with 10 CFR 50.54(hh)(2). Energy Northwest's 30-day response is provided in the attachment. There are no new commitments contained in this letter.

If you have any questions or require additional information, please contact LL Williams, (Acting) Licensing Supervisor, at (509) 377-8148.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the date of this letter.

Respectfully,

A handwritten signature in black ink, appearing to read 'BJ Sawatzke', with a stylized flourish at the end.

BJ Sawatzke

Vice President, Nuclear Generation & Chief Nuclear Officer

Attachment: 30-Day Response to NRC Bulletin 2011-01, Mitigating Strategies

cc:	NRC Region IV Administrator	NRC Senior Resident Inspector/988C
	NRC NRR Project Manager	RN Sherman – BPA/1399
	WA Horin – Winston & Strawn	

### **30-DAY RESPONSE TO NRC BULLETIN 2011-01, MITIGATING STRATEGIES**

Attachment

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On May 11, 2011, the U.S. Nuclear Regulatory Commission (NRC) issued Bulletin 2011-01, "Mitigating Strategies." The Bulletin requested that within 30 days of the date of this Bulletin, licensees provide information on their NRC mitigating strategies programs. The NRC questions related to the 30-day response are restated below followed by the Energy Northwest response.

1. Is the equipment necessary to execute the mitigating strategies, as described in your submittals to the NRC, available and capable of performing its intended function?

Response

Energy Northwest inspected and inventoried equipment necessary to implement the mitigating strategies required by 10 CFR 50.54 (hh)(2) and verified it was available. A complete flow test on the B.5.b pumper/ladder truck was performed to ensure it is capable of performing its intended function with respect to the mitigation strategies. The referenced inspections and equipment testing were recently performed. Letters of Agreement/Memorandums of Understanding with offsite organizations were also re-validated and/or re-issued, as appropriate.

2. Are the guidance and strategies implemented capable of being executed considering the current configuration of your facility and current staffing and skill levels of the staff?

Response

Energy Northwest verified that the mitigation strategies associated with large area fires and explosions are available and capable of being performed as described in our Mitigation Strategy License Condition. Each procedure implementing the required mitigation strategies was walked down to ensure the procedure(s) are in place and capable of being implemented. Energy Northwest's mitigation strategies continue to meet the commitments described in our B.5.b submittals as documented in the B.5.b Safety Evaluation Report (See Reference 8).

Energy Northwest is capable of executing the strategies with the current staffing. As discussed above, each procedure implementing the required mitigation strategies was walked down to ensure the procedures were in place and capable of being implemented. Operations and support staff have had training and periodic retraining, as required, on the mitigation strategies procedures.

## **30-DAY RESPONSE TO NRC BULLETIN 2011-01, MITIGATING STRATEGIES**

Attachment

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### **REFERENCES:**

- 1) Energy Northwest letter GO2-05-098, dated May 31, 2005. Response to NRC Guidance Regarding Mitigation Strategies.
- 2) Energy Northwest letter GO2-06-041, dated March 9, 2006. Response to Temporary Instruction 2515/164 NRC Inspection Report 05000397/2005012.
- 3) Energy Northwest letter GO2-06-083, dated March 31, 2006. Revised Response to Temporary Instruction 2515/164 NRC Inspection Report 05000397/2005012.
- 4) Energy Northwest letter GO2-06-107, dated August 15, 2006. Revised Dates to Complete Two Commitments NRC Inspection Report 05000397/2005012.
- 5) Energy Northwest letter GO2-06-137, dated November 13, 2006. Revised Completion Dates for Commitments Made in Response to Temporary Instruction 2515/164 NRC Inspection Report 05000397/2005012.
- 6) Energy Northwest letter GO2-07-030, dated February 15, 2007. Response Providing Information Regarding Implementation Details for the Phase 2 and 3 Mitigation Strategies.
- 7) Energy Northwest letter GO2-07-075, dated April 27, 2007. Clarifying Information Regarding Implementation Details for the Phase 2 and 3 Mitigation Strategies.
- 8) NRC letter dated August 9, 2007. Conforming License Amendments to Incorporate The Mitigation Strategies Required by Section B.5.b. of Commission Order EA-02-026.
- 9) Energy Northwest letter GO2-08-013, dated January 30, 2008. Supplemented Response Providing Information Regarding Implementation Details for the Phase 2 and 3 Mitigation Strategies.