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# PUBLIC SUBMISSION

**Docket:** NRC-2010-0029

Notice of Receipt and Availability of Application for Renewal of Columbia Generating Station Facility Operating License

**Comment On:** NRC-2010-0029-0015

Energy Northwest, Columbia Generating Station; Notice of Availability of Draft Supplement 47 to the Generic Environmental Impact Statement for License Renewal of Nuclear Plants and Public Meetings for the License Renewal of Columbia Generating Station

**Document:** NRC-2010-0029-DRAFT-0066

Comment on FR Doc # 2011-22415

## Submitter Information

**Name:** Gerry Pollet

**Address:**

1314 NE 56th St. #100  
Seattle, WA, 98105

**Submitter's Representative:** Gerry Pollet

**Organization:** Heart of America Northwest and Heart of America Northwest Research Center

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RULES AND REGULATIONS

## General Comment

Request for Extension of Comment Period for  
Columbia Generating Station Relicensing Environmental Impact Statement  
NRC-2010-0029

Heart of America Northwest and Heart of America Northwest Research Center hereby formally request the Commission (NRC) to extend the comment period on the Columbia Generating Station Environmental Impact Statement for a period of 30 days after the NRC releases its pending inspection report(s) on events which include a hydrogen explosion or burn and major safety condition violations; Energy Northwest (ENW) releases public records requested that are vital for the public to review safety and cost issues associated with relicensing, in the event that ENW moves forward with its pending proposal to utilize Plutonium or MOX fuel in the reactor; and, for 30 days to allow the public to review the inspection and event notification reports issued on November 14 and 15, 2011; including the inspection report regarding a hydrogen explosion at the reactor reported by subcontractor B&W in April.

Over 40 of our members attended by phone or in person the hearing on the EIS held in Richland Washington, and many more of our members may comment based on review of the records which are central to numerous

SUNS1 Review Complete

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Template = ADM-013

Add: D. Doyle (DIO) S. Freeman (S2FU)

<https://fdms.erulemaking.net/fdms-web-agency/component/content/streamer?objectId=0900006480f6d22...> 11/16/2011

site and reactor specific conditions and plans after review by our organization and our members. However, records essential to review of issues raised in the Draft EIS have not been released under a request to ENW pursuant to Washington's Public Records Act, RCW Chapter 42.56. ENW has responded that these records are expected to be provided by December 21, 2011. If ENW requires until December 21, 2011 to release public records that are related to pending formal proposals which are discussed in the EIS, then the NRC must extend the comment period until the records have been released and available for public review for a period of 30 days.

Please see attachment for full request and information which does not fit within the 200 character limit.

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## **Attachments**

Request for Extension of Comment Period for CGS Reactor Draft EIS NRC doc NRC-2010-0029

NRC Special Event Report for CGS loss of Emergency Filtration Support Nov 14 2011

ENW 4th installment ltr saying will take longer to fully respond 9-13-11

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Over 40 of our members attended by phone or in person the hearing on the EIS held in Richland Washington, and many more of our members may comment based on review of the records which are central to numerous site and reactor specific conditions and plans after review by our organization and our members. However, records essential to review of issues raised in the Draft EIS have not been released under a request to ENW pursuant to Washington's Public Records Act, RCW Chapter 42.56. ENW has responded that these records are expected to be provided by December 21, 2011. If ENW requires until December 21, 2011 to release public records that are related to pending formal proposals which are discussed in the EIS, then the NRC must extend the comment period until the records have been released and available for public review for a period of 30 days.

NEPA requires that all records and documents relied on by an applicant or agency for a draft EIS to be available. The agency, NRC, in this case has identified in the Draft EIS that the applicant and another federal agency (U.S. Department of Energy) have a formal pending proposal that is related to the pending relicensing and which may have significant potential impacts (cumulative or on its own). The scope of that pending proposal, for which funds are being expended and formal commitments and contracts have been entered into, is not disclosed and cannot be assessed as required by NEPA until the requested records have been released.

ENW's Aging Maintenance Program, the status of safety systems at the reactor and whether conditions inside the reactor are as represented in the application are central issues for the Draft EIS and the public's ability to comment on the Draft EIS.

The public's ability to comment on each of these major issues is adversely affected and compromised by:

- The lack of availability for the public to review findings and information regarding the "unusual event" reported to the Nuclear Regulatory Commission concerning a "hydrogen burn" that took place April 7, 2011;
- Documented allegations in the lawsuit filed on November 14, 2011 by Babcock and Wilcox, contractor for the extended refueling and maintenance outage which ended in September, 2011, that site conditions, and the time required to complete the project "were significantly different than represented by ENW".
  - The site conditions which were different were radiological contamination in the reactor which are also different than conditions reported in the draft EIS
  - The cause of the contamination and other differences in condition are vital issues for the public to comment on regarding ENW's aging maintenance programs and the safety status of the reactor and its suitability to operate until 2043.

- As reported in Clearing Up on November 14, 2011 – less than 48 hours before the close of the comment period:  
 “On Sept. 26, the NRC said it was preparing a ‘special inspection’ to review three events during the outage “in which operators inadvertently drained reactor >coolant from the plant’s reactor vessel.” It said the report would be issued ‘within 45 days,’ meaning no later than Nov. 10, but the NRC now says it ‘may be a few more weeks.’  
  
 “It was unclear whether the three events NRC is investigating include or are related to the April 7 ‘hydrogen puff’ ENW reported, and which appear to be the ‘hydrogen explosion’ B&W reported in its lawsuit. NRC spokeswoman Lara Uselding declined to say specifically if the agency was investigating the explosion or B&W’s reports of radiological conditions at the work site. ‘We are doing the special inspection to gain more insights into the >incidents involving the condenser and outage work,’ she told Clearing Up.”
- On November 14, the NRC issued another current Event Notification regarding a major safety system loss of capability at the CGS Reactor:  
 Event Number: 47429  
 LOSS OF TECHNICAL SUPPORT CENTER EMERGENCY FILTRATION SYSTEM DURING MAINTENANCE

“At 1439 PST on 11-10-2011, while performing maintenance on the Technical Support Center (TSC) emergency filtration system, it was discovered that replacement gaskets required to restore the system were undersized and that the system could not be restored. Specifically the replacement gaskets were determined to be too small. All spare gaskets onsite were examined and determined to suffer from the same undersized condition. Prior to discovery of the undersized gaskets, the maintenance plan allowed for prompt system restoration in the event of an emergency.

“The current lack of a suitable replacement gasket has resulted in a condition which represents a **major loss of emergency preparedness capability** per 10 CFR 50.72(b)(3)(xiii) in that TSC habitability might not be sustainable during certain events due to the inability of the filtration system to maintain a habitable atmosphere. Station procedures provide instructions to relocate the TSC if monitoring during an emergency event indicates that habitability cannot be maintained. Compensatory measures are being developed (while the restoration work is ongoing) to heighten awareness of responsible TSC staff following ERO activation to monitor TSC habitability in accordance with procedures and to consider potential TSC relocation as necessary as described in the station emergency plan.

It is vital that the public have access to, and time to review, the pending NRC inspection report and to review the results of inspections and reports regarding the event of November 10, 2011 for a minimum of 30 days prior to the closing of the comment period on the Draft EIS. These events and reports directly bear on the conclusions and conditions reported in the Draft EIS. Without the reports the public cannot effectively comment on whether conditions at the Reactor and its management capabilities for the Aging Maintenance Program are as represented.

Please respond to this request and consider the above formal comments to be addressed in the EIS.  
 Gerry Pollet, JD;  
 Executive Director,  
 Heart of America Northwest, and  
 Heart of America Northwest Research Center  
 1314 NE 56<sup>th</sup> St. #100  
 Seattle, WA 98105  
[office@hoanw.org](mailto:office@hoanw.org) and [Gerry@hoanw.org](mailto:Gerry@hoanw.org)  
 (206)382-1014

## Current Event Notification Report for November 14, 2011

U.S. Nuclear Regulatory Commission  
Operations Center  
Event Reports For  
11/10/2011 - 11/14/2011

Power Reactor	Event Number: 47429
Facility: COLUMBIA GENERATING STATION Region: 4 State: WA Unit: [2] [ ] [ ] RX Type: [2] GE-5 NRC Notified By: RICHARD GARCIA HQ OPS Officer: HOWIE CROUCH	Notification Date: 11/10/2011 Notification Time: 21:54 [ET] Event Date: 11/10/2011 Event Time: 14:39 [PST] Last Update Date: 11/12/2011
Emergency Class: NON EMERGENCY 10 CFR Section: 50.72(b)(3)(xiii) - LOSS COMM/ASMT/RESPONSE	Person (Organization): MICHAEL HAY (R4DO)

Unit	SCRAM Code	RX CRIT	Initial PWR	Initial RX Mode	Current PWR	Current RX Mode
2	N	Y	100	Power Operation	100	Power Operation

### Event Text

#### LOSS OF TECHNICAL SUPPORT CENTER EMERGENCY FILTRATION SYSTEM DURING MAINTENANCE

"At 1439 PST on 11-10-2011, while performing maintenance on the Technical Support Center (TSC) emergency filtration system, it was discovered that replacement gaskets required to restore the system were undersized and that the system could not be restored. Specifically the replacement gaskets were determined to be too small. All spare gaskets onsite were examined and determined to suffer from the same undersized condition. Prior to discovery of the undersized gaskets, the maintenance plan allowed for prompt system restoration in the event of an emergency.

"The current lack of a suitable replacement gasket has resulted in a condition which represents a **major loss of emergency preparedness capability** per 10 CFR 50.72(b)(3)(xiii) in that TSC habitability might not be sustainable during certain events due to the inability of the filtration system to maintain a habitable atmosphere. Station procedures provide instructions to relocate the TSC if monitoring during an emergency event indicates that habitability cannot be maintained. Compensatory measures are being developed (while the restoration work is ongoing) to heighten awareness of responsible TSC staff following ERO activation to monitor TSC habitability in accordance with procedures and to consider potential TSC relocation as necessary as described in the station emergency plan.

"Work is underway to return the TSC filtration system to functional status with a high priority."

The licensee has notified the NRC Resident Inspector.

\*\*\* UPDATE FROM MICHAEL STODICK TO HOWIE CROUCH AT 2039 EST ON 11/12/11 \*\*\*

"Maintenance work on the TSC emergency filtration system has been completed. A post functional test has been performed and it has been evaluated that the TSC emergency filtration system's function has been restored as of 1718 PST on 11/12/2011. The NRC Resident Inspector will be notified."  
Notified R4DO (Hay).

**From:** "Kellett, Marian" <mkellett@energy-northwest.com>

**Sent:** Tuesday, September 13, 2011 4:21 PM

**To:** "office@hoanw.org" <office@hoanw.org>, "gerry@hoanw.org" <gerry@hoanw.org>

**Subject:** Energy Northwest Request for Public Records Control No 2011-08 - Heart of America Northwest, Ross Pearson - 4th Installment .

Mr. Pearson:

Good afternoon. Attached to this email is the fourth installment of records associated with Heart of America Northwest Research Center's and Tom Clements' Public Records Request. It includes items meeting the criteria we agreed upon in our July 18, 2011, correspondence.

As you're aware, we initially estimated that this request could be completed in 90 days, with a deadline of September 23, 2011. At the time we provided this estimate, we had not yet determined the volume of the request, which is quite large. Based on the processing time to date for this request, we are adjusting our anticipated deadline for completion to December 21, 2011. As previously agreed, we have been transmitting material as it becomes available and will continue to do so throughout the course of fulfilling this request. At this time, we have processed approximately 10% of the request.

We are currently fulfilling a large volume of public records requests in addition to the Heart of America Northwest request, and have to manage this work in association with the rest of our business responsibilities. However, please be assured that we continue to work toward making these records available to you on a consistent basis, and that I am continuing my personal oversight of the processing to ensure that we fulfill this request as quickly as reasonably possible. If you have any questions or comments, please don't hesitate to call me at (509) 377-8321.

Marian Kellett

Manager, Document & Data Services/Records Officer, Energy Northwest