



ENERGY NORTHWEST

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April 2, 2012
GO2-12-048

10 CFR 2.202

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

Subject: COLUMBIA GENERATING STATION, DOCKET NO. 50-397, LICENSE NO. NPF-21; ENERGY NORTHWEST'S ANSWER TO MARCH 12, 2012 COMMISSION ORDER MODIFYING LICENSES WITH REGARD TO RELIABLE HARDENED CONTAINMENT VENTS

Reference: Issuance of Order to Modify Licenses with Regard to Reliable Hardened Containment Vents (Order EA-12-050)

Dear Sir or Madam:

Pursuant to the requirements of 10 CFR 2.202(a)(2), Energy Northwest's answer to the March 12, 2012 Commission Order modifying licenses with regard to reliable hardened containment vents is enclosed.

There are no commitments being made to the NRC herein. If you have any questions or require additional information, please contact Mr. ZK Dunham at (509) 377-4735.

Respectfully,

BJ Sawatzke
Vice President, Nuclear Generation & Chief Nuclear Officer

Enclosure: As stated

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

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NRR

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)
)
ALL OPERATING BOILING WATER) Docket No. 50-397
REACTOR LICENSEES WITH MARK I) License No. NPF-21
AND MARK II CONTAINMENTS) EA-12-050
)

**ENERGY NORTHWEST'S ANSWER TO
COMMISSION ORDER MODIFYING LICENSES
WITH REGARD TO RELIABLE HARDENED CONTAINMENT VENTS**

I.

On March 12, 2012, the Nuclear Regulatory Commission ("NRC" or "Commission") issued an immediately effective order in the captioned matter entitled Order Modifying Licenses with Regard to Reliable Hardened Containment Vents (Effective Immediately) ("Order") to, *inter alia*, Energy Northwest.

Specifically with respect to this Order, the NRC has decided that BWRs with Mark I and Mark II containments shall have a reliable hardened venting system to remove decay heat and maintain control of containment pressure within acceptable limits following events that result in loss of active containment heat removal capability or prolonged Station Blackout (SBO). Specific requirements for reliable hardened vents are outlined in Attachment 2 to the Order.

The Order requires submission of an overall integrated plan including a description of how compliance with the requirements described in Attachment 2

will be achieved to the NRC for review by February 28, 2013. In addition, the Order requires submission of an initial status report 60 days following issuance of the final interim staff guidance and at six month intervals following submittal of an overall integrated plan on February 28, 2013. The Order states that the NRC intends to issue the interim staff guidance containing specific details on implementation of the requirements of this Order in August 2012. Finally, the Order requires full implementation of its requirements no later than two refueling cycles after submittal of the overall integrated plan, or December 31, 2016, whichever comes first.

The Order also states that the Commission intends to decide, after receipt of a Policy Paper from the NRC staff, whether to require installation of filtration systems on these hardened vent systems (Order at Section II, p. 5). The Policy Paper is scheduled to be delivered by July 2012. The full extent of work necessary to implement this Order cannot be known until after Commission action after review of the NRC staff's July 2012 Policy Paper.

Pursuant to 10 CFR § 2.202 and the terms specified in the Order, Energy Northwest hereby submits its answer to the Order. Energy Northwest consents to the Order and does not request a hearing. Based on information currently available, Energy Northwest has not identified any circumstances of the type described in Sections IV.B.1 and IV.B.2 of the Order requiring relief at this time. In addition, Energy Northwest has not identified any impediments to compliance with the Order within two refueling cycles after submittal of the integrated plan, or

December 31, 2016, whichever is earlier. Energy Northwest will provide further responses as required by Section IV.C in accordance with the specified deadlines. However, given the uncertainties associated with the ultimate scope of required work caused by the unavailability of implementing guidance until August 2012, and the impact on the ability of Energy Northwest to comply with the specific compliance deadline dates based on the probable availability of that guidance, Energy Northwest's future responses may include requests for schedule relief. Any such request would be submitted in accordance with the relaxation provision in Section IV of the Order.

I declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted,

A handwritten signature in black ink, appearing to be "M. J. [unclear]", written in a cursive style.

Executed on: April 2, 2012