



**ENERGY
NORTHWEST**

Bradley J. Sawatzke
Columbia Generating Station
P.O. Box 968, PE08
Richland, WA 99352-0968
Ph. 509.377.4300 | F. 509.377.4150
bjsawatzke@energy-northwest.com

April 2, 2012
GO2-12-049

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 SPENT FUEL POOL INSTRUMENTATION**

**Reference: Issuance of Order to Modify Licenses with Regard to Reliable Spent Fuel Pool
Instrumentation (Order EA-12-051)**

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 license with regard to reliable spent fuel pool instrumentation 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

ADD
NRR

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)	
)	
ALL POWER REACTOR)	Docket No. 50-397
LICENSEES AND HOLDERS)	License No. NPF-21
OF CONSTRUCTION PERMITS IN)	EA-12-051
ACTIVE OR DEFERRED STATUS)	
)	

**ENERGY NORTHWEST'S ANSWER TO
ORDER MODIFYING LICENSES
WITH REGARD TO RELIABLE SPENT FUEL POOL INSTRUMENTATION**

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 Spent Fuel Pool Instrumentation (Effective Immediately) ("Order") to, *inter alia*, Energy Northwest. With respect to this Order, licensees are specifically directed to provide a reliable means of remotely monitoring "wide-range spent fuel pool levels" to support effective prioritization of event mitigation and recovery actions in the event of a beyond-design-basis external event. Specific requirements 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.

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 read "M. J. [unclear]", written in a cursive style.

Executed on: April 2, 2012