



# ENERGY NORTHWEST

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June 11, 2012  
GO2-12-081

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  
ENERGY NORTHWEST'S 90 DAY RESPONSE TO THE MARCH 12, 2012  
INFORMATION REQUEST RELATED TO RECOMMENDATION 2.1 FOR  
SEISMIC EVALUATIONS**

**Reference:** Letter dated March 12, 2012, from EJ Leeds (NRC) to All Power Reactor Licensees and Holders of Construction Permits in Active or Deferred Status, "Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3 and 9.3 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident"

Dear Sir or Madam:

On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued the referenced Information Request. Enclosure 1 of the letter contains specific Requested Actions, Requested Information and Required Responses associated with Recommendation 2.1 for seismic evaluations. Enclosure 1 of the letter states that if an addressee cannot meet the required response date, then the addressee must provide a response within 90 days of the date of the letter and describe the alternative course of action that it proposes to take, including the basis of the acceptability of the proposed alternative course of action and estimated completion date. After a careful review of the requested actions and information, Energy Northwest proposes to take the course of action described in Attachment 1 of this letter. The basis for the request is also described in Attachment 1. Commitments are identified in Attachment 2.

If you have any questions or require additional information, please contact Mr. ZK Dunham at (509) 377-4735.

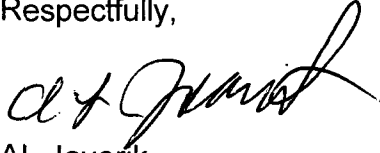
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**ENERGY NORTHWEST'S 90 DAY RESPONSE TO THE MARCH 12, 2012  
INFORMATION REQUEST RELATED TO RECOMMENDATION 2.1 FOR SEISMIC  
EVALUATIONS**

Page 2 of 2

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 'AL Javorik', written in a cursive style.

AL Javorik  
Vice President, Engineering

Attachments: As stated

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

**ENERGY NORTHWEST'S 90 DAY RESPONSE TO THE MARCH 12, 2012  
INFORMATION REQUEST RELATED TO RECOMMENDATION 2.1 FOR SEISMIC  
EVALUATIONS**

Attachment 1

Page 1 of 2

**Alternative Schedule and Basis:**

Energy Northwest is unable to determine whether or not the requested response dates can be met for submitting the Seismic Hazard Evaluation and Seismic Risk Evaluation (Requested Information items 1 through 9 in Enclosure 1 of Reference 1) for Columbia Generating Station (Columbia) until the guidance contained in the Screening, Prioritization and Implementation Document (SPID) is endorsed by the NRC. For example, critical details need to be mutually understood prior to commencement of the new seismic hazard evaluations. This includes the elevation(s) at which the hazard/ground motion response spectrum (GMRS) will be calculated and the development of the site amplification factors for sites with limited soil/rock profile data.

Within 60 days of NRC endorsement of the SPID guidance, Energy Northwest will submit: 1) its intention to follow the endorsed guidance or 2) an alternative approach, including acceptance criteria. In that submittal, Energy Northwest will submit its intent to meet the Required Response dates for submitting the Seismic Hazard Evaluation and Seismic Risk Evaluation or provide an alternative schedule.

Additionally, Enclosure 1 of Reference 1 requests addressees perform a reevaluation of the seismic hazards at their sites using present-day NRC requirements and guidance to develop a GMRS. Addressees whose plants lie in the Western United States (WUS) are requested to develop seismic source and ground motion models to characterize their regional and site-specific hazards and should perform a Senior Seismic Hazard Analysis Committee (SSHAC) Level 3 study to develop a probabilistic seismic hazard analysis as described in NUREG-2117, "Practical Implementation Guidelines for SSHAC Level 3 and 4 Hazard Studies."

Currently, it is Energy Northwest's intent to perform a SSHAC Level 3 study in accordance with NUREG-2117 for ground motion characterization (GMC) and site source characterization (SSC) and to meet the schedule for completion of the subsequent Seismic Hazard Evaluation for Columbia by March 12, 2015, as specified in Enclosure 1 of Reference 1. However, an alternate plan may be necessary because the number of personnel available with the level of seismic expertise necessary to participate in the SSHAC process for WUS nuclear power plants is limited. The WUS plants will be performing six to eight SSHACs within this three year period. This resource limitation has the potential to delay the development of the new models needed for performance of the Seismic Hazard Evaluation within three years.

Energy Northwest is currently retaining experts and coordinating with the Department of Energy (DOE) concerning the performance of the required SSHAC Level 3 activities. Completion of these actions will permit Energy Northwest and the other WUS plants to better estimate the time frames needed for implementation of the SSHAC Level 3 process. If it is determined that Energy Northwest will be unable to implement these

**ENERGY NORTHWEST'S 90 DAY RESPONSE TO THE MARCH 12, 2012  
INFORMATION REQUEST RELATED TO RECOMMENDATION 2.1 FOR SEISMIC  
EVALUATIONS**

Attachment 1

Page 2 of 2

activities on a schedule that supports completion of a Seismic Hazard Evaluation for Columbia by March 12, 2015, as required by Enclosure 1 of Reference 1, Energy Northwest proposes to meet with the NRC to agree upon a new completion date. Additionally, if resource constraints develop during the estimated 2.5 years it will take to complete the SSHAC Level 3 process, Energy Northwest proposes to meet with the NRC to develop a revised mutually agreeable schedule. Any revised schedule will consider prioritization of the limited available resources for the WUS sites.

Energy Northwest believes that this course of action is acceptable because it will result in performance of the SSHAC process and seismic hazard evaluation for Columbia in accordance with applicable NRC guidance though potentially on a different schedule.

**References:**

1. NRC letter dated March 12, 2012, from Eric J Leeds (NRC) to All Power Reactor Licensees and Holders of Construction Permits in Active or Deferred Status, "Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3 and 9.3 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident"

**ENERGY NORTHWEST'S 90 DAY RESPONSE TO THE MARCH 12, 2012  
INFORMATION REQUEST RELATED TO RECOMMENDATION 2.1 FOR SEISMIC  
EVALUATIONS**

Attachment 2

Page 1 of 1

The following table identifies the regulatory commitments in this document. Any other statements in this submittal intended or planned actions, are provided for information purposes, and are not considered to be regulatory commitments.

Commitment	Scheduled Completion Date
Energy Northwest will submit its intent to meet the Required Response dates for submitting the Seismic Hazard Evaluation and Seismic Risk Evaluation or provide an alternative schedule.	Within 60 days of NRC endorsement of the SPID guidance.