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August 16, 2012  
GO2-12-113

10 CFR 95.19(c)

ATTN: Document Control Desk  
Director, Division of Security Operations (MS0-2D15)  
Office of Nuclear Security and Incident Response  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Subject: **COLUMBIA GENERATING STATION, DOCKET NO. 50-397, FOREIGN OWNERSHIP, CONTROL, OR INFLUENCE (FOCI)**

Reference: Letter from Bernard W. Stapleton (NRC) to Mark E. Reddemann (EN), regarding request to update Foreign Ownership, Control, or Influence (FOCI) determination, dated February 1, 2012

Dear Sir or Madam:

In response to the referenced letter, completed packages documenting the current status of Foreign Ownership, Control, or Influence (FOCI) of Columbia Generating Station (Columbia) are attached. The attached forms for Owners, Officers, Directors, and Executive Personnel (OODEP) which includes Attachment "A", and the Representative of Foreign Interest (RFI) Statement contain personal information. Energy Northwest (EN) requests that these documents be withheld from public disclosure in accordance with 10 CFR 2.390. In addition, EN requests that Standard Form-328, Certificate Pertaining to Foreign Interests and the Standard Practice Procedures Plan be withheld from public disclosure under 10 CFR 2.390 because these forms contain confidential commercial information and/or security-related information. EN has included a 10 CFR 2.390 Affidavit to support the request to withhold these documents from public disclosure.

There are no commitments included with this submittal. If there are any questions, please contact R. Dutton at (509) 377-4650.

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**FOREIGN OWNERSHIP, CONTROL, OR INFLUENCE (FOCI)**

Page 2 of 2

Respectfully,

A handwritten signature in black ink, appearing to read "DW Gregoire". The signature is written in a cursive style with a large initial "D" and "W".

DW Gregoire  
Manager, Regulatory Affairs

Attachments: 10 CFR 2.390 Affidavit and Current Status of FOCI of Columbia  
Generating Station for ENW

cc: NRC Region IV Administrator w/o  
NRC NRR Project Manager w/o  
NRC Sr. Resident Inspector (988C) w/o

**Affidavit in Support of Request to Withhold Information from  
Public Disclosure Pursuant to 10 C.F.R. § 2.390**

I, Bradley J. Sawatzke, hereby affirm and state as follows:

1. I am the Vice President, Nuclear Generation and Chief Nuclear Officer for Energy Northwest and I am authorized to execute this affidavit on behalf of Energy Northwest, (hereinafter referred to as "Licensee"), the owner of the Columbia Generating Station.
2. The Licensee is submitting a complete, updated Foreign Ownership, Control, or Influence (FOCI) Renewal package to the Nuclear Regulatory Commission (NRC) for its review and for the purpose of obtaining a renewal of its non-possessing facility clearance (FCL) at the Secret – National Security Information level. This information is submitted pursuant to the NRC's letter dated February 1, 2012 to the Licensee's Chief Executive Officer, Mark E. Reddemann.
3. Under Tab No. 2 of the FOCI Renewal Package, the Licensee has submitted a completed Standard Form-328 with two attachments as supporting documentation required by Standard Form-328. Tab No. 2.1 contains the Licensee's answer to Question No. 5 of the Standard Form 328. Tab No. 2.2 under Tab No. 2 contains the Representative of Foreign Interest (RFI) Statement by the Licensee's Chief Executive Officer, Mark E. Reddemann, in answer to Question No. 9 on the Standard Form-328.
4. The information contained under Tab. No. 2.2, the RFI Statement, contains personal privacy information, including social security numbers, that is appropriate to be withheld from public disclosure in accordance with 10 C.F.R. § 2.390(a)(6).
5. The information provided under Tab No. 2 the completed SF-328 form contains confidential commercial information that should be held in confidence by the NRC pursuant to 10 C.F.R. § 2.390(a)(4) and 10 C.F.R. § 9.17(a)(4). The following factors specified in 10 C.F.R. § 2.390(b)(4) justify withholding this information from public disclosure in its entirety:
  - a. This information is and has been held in confidence by the Licensee;
  - b. This information is a type that is held in confidence by the Licensee and there is a rational basis for doing so because the information contains

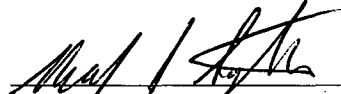
sensitive business information related to the business structure of the Licensee;

- c. This information is being submitted to the NRC in confidence; and
  - d. This information is not readily available in public sources and could not be gathered readily from other publicly available information.
6. Under Tab No. 3 of its FOCI Package, the Licensee has submitted a completed List of All Owners, Officers, Directors, and Executive Personnel (OODEPs) Form, along with Attachment "A" which is under Tab No. 3.1, which is a detailed OODEPs listing of all members of the Board of Directors, Executive Board and Executive Personnel.
  7. The documents provided under Tab No. 3 and Tab No. 3.1 contain personal privacy information, including social security numbers, and is appropriate to be withheld from public disclosure in accordance with 10 C.F.R. § 2.390(a)(6) in order to prevent any adverse effect to employees, officers and directors of the Licensee.
  8. Under Tab No. 7 of its FOCI Package, the Licensee has submitted a completed and signed Standard Practices Procedure Plan. The Standard Practices Procedure Plan provided under Tab No. 7 contains security-related sensitive information which should be held in confidence and withheld from public disclosure for the following reasons:
    - a. The information is previously determined to be security-related information;
    - b. The information sought to be withheld is being provided to the NRC in confidence, and under the provisions of 10 C.F.R. § 2.390(d)(1), it is to be received in confidence by the NRC; and
    - c. This information is not readily available in public sources and could not be gathered readily from other publicly available information.

Accordingly, the Licensee requests that the documents contained under the following Tab numbers (2, 2.2, 3, 3.1 and 7) of the Licensee's FOCI Renewal update be withheld from public disclosure pursuant to 10 C.F.R. § 2.390 and 10 C.F.R. § 9.17.

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

Executed this 15<sup>th</sup> day of August, 2012.

  
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Bradley J. Sawatzke

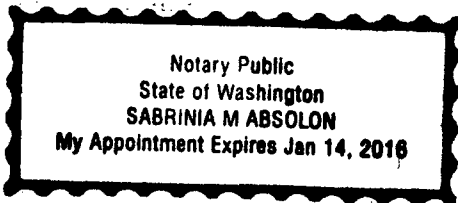
STATE OF WASHINGTON )

ss

COUNTY OF BENTON )

On this day personally appeared before me BRADLEY J. SAWATKZE, to me known to be the Vice President of Nuclear Generation and Chief Nuclear Officer of Energy Northwest, a Washington municipal corporation, the corporation that executed the within and foregoing instrument, and acknowledged said instrument to be the free and voluntary act and deed of said corporation, for the uses and purposes therein mentioned, and on oath stated that he is authorized to execute said instrument.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal this 15<sup>th</sup> day of August, 2012.



  
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NOTARY PUBLIC in and for the State of

Washington, Residing at Benton City, WA

My commission expires: 1/14/16.