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January 22, 2013 GO2-13-012

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 RESPONSE TO THE MARCH 12, 2012 INFORMATION REQUEST – FLOODING INTEGRATED ASSESSMENT APPROACH

#### References:

- 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"
- Letter, GO2-12-082, dated June 11, 2012, AL Javorik (Energy Northwest) to NRC, "Energy Northwest's 90 Day Response to the March 12, 2012 Information Request Related to Recommendation 2.1 and 2.3 For Flooding Evaluations and Walkdowns"
- 3. Letter dated December 3, 2012, from DL Skeen (NRC) to JE Pollock (NEI), "Trigger Conditions for Performing an Integrated Assessment and Due Date for Response"
- 4. NRC Interim Staff Guidance JLD-ISG-2012-05, "Guidance for Performing the Integrated Assessment for External Flooding," Revision 0, November 30, 2012

### Dear Sir or Madam:

In Reference 1, the NRC staff issued the request for information associated with Near-Term Task Force (NTTF) Recommendation 2.1 for Flooding to Columbia Generating Station (Columbia). In Reference 2, Energy Northwest, the licensee for Columbia, committed to submit an approach for developing an Integrated Assessment for Columbia within 60 days after the NRC endorses Integrated Assessment guidance.

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# ENERGY NORTHWEST'S RESPONSE TO THE MARCH 12, 2012 INFORMATION REQUEST – FLOODING INTEGRATED ASSESSMENT APPROACH Page 2 of 2

As described in Reference 2, the Flooding Hazard Reevaluation Report for Columbia is due by March 12, 2014. In general, if the reevaluated flood is not bounded by the current design basis, an integrated assessment must be performed. However, Reference 3 provides a number of potential scenarios (trigger conditions) that may only necessitate a limited evaluation. For these scenarios, the limited evaluation will be submitted with the hazard reevaluation. The scope of the limited evaluation will be consistent with the guidance in Reference 3. If an Integrated Assessment is required pursuant to Reference 3, Energy Northwest will utilize the guidance in Reference 4 for developing an Integrated Assessment Report including criteria for identifying vulnerabilities.

Attachment 1 identifies new commitments as a result of this letter.

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

I declare under penalty of perjury that the foregoing is true and correct. Executed on the date of this letter.

Respectfully,

D. A. Swank

Assistant Vice President, Engineering

Attachment – List of Commitments

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

## ENERGY NORTHWEST'S RESPONSE TO THE MARCH 12, 2012 INFORMATION REQUEST – FLOODING INTEGRATED ASSESSMENT APPROACH

Attachment 1
Page 1 of 1

### **List of Commitments**

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

Commitment	Scheduled Completion  Date
Following completion of the Flooding Hazard Reevaluation Report, Energy Northwest will utilize the guidance in the NRC letter dated December 3, 2012, from DL Skeen (NRC) to JE Pollock (NEI), "Trigger Conditions for Performing an Integrated Assessment and Due Date for Response," to determine if an Integrated Assessment or limited evaluation is required. If a limited evaluation is performed, the results will be submitted along with the Flooding Hazard Reevaluation Report.	March 12, 2014
If an Integrated Assessment is required, Energy Northwest will perform the assessment utilizing the guidance in JLD-ISG-12-05, "Guidance for Performing the Integrated Assessment for External Flooding."	March 12, 2016