



February 27, 2014  
GO2-14-030

EA-12-051

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

Subject: **COLUMBIA GENERATING STATION, DOCKET NO. 50-397  
ENERGY NORTHWEST'S SECOND SIX-MONTH STATUS UPDATE  
REPORT FOR THE IMPLEMENTATION OF NRC ORDER EA-12-051  
RELIABLE SPENT FUEL POOL INSTRUMENTATION**

- References:
1. NRC Order EA-12-051 dated March 12, 2012, "Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation"
  2. Letter GO2-13-036, dated February 28, 2013, from DA Swank (Energy Northwest) to NRC, "Energy Northwest's Response to NRC Order EA-12-051 – Overall Integrated Plan for Reliable Spent Fuel Pool Instrumentation"
  3. Letter dated June 20, 2013, from LK Gibson (NRC) to ME Reddemann (Energy Northwest), "Columbia Generating Station – Request for Additional Information Regarding Spent Fuel Pool Instrumentation (TAC No. MF0797)"
  4. Letter GO2-13-100, dated July 19, 2013, from DA Swank (Energy Northwest) to NRC, "Energy Northwest's Response to Request for Additional Information Related to the Overall Integrated Plan for Spent Fuel Pool Instrumentation"
  5. Letter GO2-13-121, dated August 23, 2013, from DA Swank (Energy Northwest) to NRC, "Energy Northwest's First Six Month Status Update Report for the Implementation of NRC Order EA-12-051 Reliable Spent Fuel Pool Instrumentation"
  6. Letter dated November 7, 2013, from CF Lyon (NRC) to ME Reddemann (Energy Northwest), "Columbia Generating Station – Interim Staff Evaluation and Request for Additional Information Regarding the Overall Integrated Plan for Implementation of Order EA-12-051, Reliable Spent Fuel Pool Instrumentation (TAC No. MF0797)"

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**ENERGY NORTHWEST'S SECOND SIX-MONTH STATUS UPDATE REPORT FOR THE IMPLEMENTATION OF NRC ORDER EA-12-051 RELIABLE SPENT FUEL POOL INSTRUMENTATION**

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Dear Sir or Madam,

In Reference 1, the Nuclear Regulatory Commission (NRC) issued Order EA-12-051 which directed Energy Northwest's Columbia Generating Station (Columbia) to have a reliable means of remotely monitoring wide range spent fuel pool levels to support effective prioritization of event mitigation and recovery actions for a beyond-design-basis external event. The Order also requires submission of a status update at six-month intervals following the licensee's submittal of the Overall Integrated Plan.

The attachment to this letter provides Energy Northwest's second six-month report of Columbia's status of implementing Order EA-12-051 pursuant to Section IV, Condition C.2 of Reference 1. As stated in the Memorandum dated December 26, 2014, from C. A. Hunt (NRC) to M. A. Mitchell (NRC), "Summary of the November 26, 2013, Public Meeting to Discuss Industry Responses to Staff Interim Evaluations for Spent Fuel Pool Instrumentation," (ML13347B030) the staff clarified that the staff interim evaluation questions supersede any previous requests for information issued by the staff concerning the spent fuel instrumentation. Therefore, no updates to the RAIs discussed in References 3, 4, or 5 have been provided.

Energy Northwest is currently working with the equipment vendor to develop the responses to the RAIs contained in Reference 6 and will respond by the November 30, 2014, due date identified in Reference 6. If unable to fully respond by the requested date, Energy Northwest will inform the NRC through the NRC project management.

There are no new or revised regulatory commitments contained in this letter. If you have any questions or require additional information, please contact Ms. L. L. Williams at (509) 377-8148.

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      Second Six-Month Status Update Report for the Overall Integrated Plan for  
Reliable Spent Fuel Pool Instrumentation

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

**ENERGY NORTHWEST'S SECOND SIX-MONTH STATUS UPDATE REPORT FOR  
THE IMPLEMENTATION OF NRC ORDER EA-12-051 RELIABLE SPENT FUEL  
POOL INSTRUMENTATION**

**ATTACHMENT**

**COLUMBIA GENERATING STATION, DOCKET NO. 50-397**

**SECOND SIX-MONTH STATUS UPDATE REPORT FOR THE  
OVERALL INTEGRATED PLAN FOR RELIABLE SPENT FUEL POOL  
INSTRUMENTATION**

# **ENERGY NORTHWEST'S SECOND SIX-MONTH STATUS UPDATE REPORT FOR THE IMPLEMENTATION OF NRC ORDER EA-12-051 RELIABLE SPENT FUEL POOL INSTRUMENTATION**

Attachment

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## **1.0 Introduction**

In Reference 1, the Nuclear Regulatory Commission (NRC) issued Order EA-12-051 which directed Energy Northwest's Columbia Generating Station (Columbia) to have a reliable means of remotely monitoring wide range spent fuel pool (SFP) levels to support effective prioritization of event mitigation and recovery actions for a beyond-design-basis external event. Energy Northwest developed an Overall Integrated Plan (Reference 2) documenting the requirements to install reliable SFP level instrumentation in response to NRC Order EA-12-051. The Order also requires submission of a status update at six-month intervals following the licensee's submittal of the Overall Integrated Plan.

This is Energy Northwest's second six-month report of Columbia's status of implementing Order EA-12-051 pursuant to Section IV, Condition C.2 of Reference 1 and provides an update of milestone accomplishments since the previous update of August 23, 2013, (Reference 5). Changes are identified by a revision bar in the right column or margin.

## **2.0 Milestone Accomplishments**

The following milestones are current as of February 28, 2014.

- 1) Commenced Reliable SFP Instrumentation Engineering Detailed Design
  - a. In March of 2013 the Energy Northwest design groups (mechanical, electrical, instrumentation, and civil) began the detailed procurement specification and design change development for the Reliable SFP Instrumentation. The overall design and the plant modification packages are approximately 50% completed. The instrumentation vendor has been selected and the equipment has been specified.

## **3.0 Milestone Schedule Status**

The following provides an updated milestone schedule to support the Reliable SFP Instrumentation Overall Integrated Plan. Some changes to the schedule have been made as shown by the revision bars as the required vendor information was delayed. This information has been received and is being reviewed by Energy Northwest.

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<b>Milestones</b>	<b>Target Completion Date</b>	<b>Activity Status</b>	<b>Revised Target Completion Date</b>
<b>Correspondence &amp; Reports:</b>			
Submit 60 Day Reliable SFP Instrumentation Status Report	Oct 2012	Completed	N/A
Submit Overall Reliable SFP Instrumentation Integrated Plan	Feb 2013	Completed	N/A
First Status Update Report for the Reliable SFP Instrumentation Integrated Plan	August 2013	Completed	N/A
Second Status Update Report for the Reliable SFP Instrumentation Integrated Plan	Feb 2014	Completed	N/A
Third Status Update Report for the Reliable SFP Instrumentation Integrated Plan	August 2014	Not Started	N/A
Final Completion Report for the Reliable SFP Instrumentation Integrated Plan	Feb 2015	Not Started	N/A
<b>Engineering &amp; Modifications:</b>			
Commence Engineering Detailed Design for the Reliable SFP Instrumentation	March 2013	Completed	N/A
Complete Engineering Detailed Design for the Reliable SFP Instrumentation	Jan 2014	Started	June 2014
Commence the Reliable SFP Instrumentation Modification Installation	May 2014	Not Started	July 2014
Reliable SFP Instrumentation Channels Operational	Dec 2014	Not Started	N/A

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<b>Program &amp; Procedures:</b>			
Commence development of the Reliable SFP instrumentation testing, calibration, maintenance, surveillance, and operational procedures	April 2014	Not Started	July 2014
Complete development of the Reliable SFP instrumentation testing, calibration, maintenance, surveillance, and operational procedures	May 2014	Not Started	Dec 2014
Establish programmatic controls on SFP instrumentation related activities	Dec 2014	Not Started	N/A
<b>Operations &amp; Training:</b>			
Commence development of the Reliable SFP Instrumentation training modules	April 2014	Not Started	N/A
Complete development of the Reliable SFP Instrumentation training modules	May 2014	Not Started	N/A
Complete training of station personnel	Oct 2014	Not Started	N/A
Functional testing of Reliable SFP Instrumentation SSCs complete	Dec 2014	Not Started	N/A
Reliable SFP Instrumentation Program turned over to Operations	Dec 2014	Not Started	N/A

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## 4.0 Changes to Compliance Method

The Overall Integrated Plan (submitted in Reference 2) indicated that there would be an alternate display location for viewing level indication in the vendor electronics at the electronic control cabinet for the guided wave radar. This concept has been revised; the signal processor enclosure will now be located in the main control room. Therefore the reliable SFP instrumentation, primary and backup instrument channel display will only be located in the main control room. This design modification continues to meet the guidelines of JLD-ISG-2012-13 and NEI 12-02 section 3.9.

## 5.0 Need for Relief/Relaxation and Basis for the Relief/Relaxation

At this time, Energy Northwest expects to fully comply with the Order and its implementation date and does not anticipate a request for relief and/or relaxation of the Order.

## 6.0 Open Items

In Reference 3, the NRC requested additional information with regard to the Overall Integrated Plan and in Reference 4 Energy Northwest responded to that request with the understanding that the completed responses will be provided to the NRC in a future updated status report. In Reference 5, Energy Northwest provided the first 6-month update. However, in the Memorandum dated December 26, 2014, from C. A. Hunt (NRC) to M. A. Mitchell (NRC), "Summary of the November 26, 2013, (ML13347B030) Public Meeting to Discuss Industry Responses to Staff Interim Evaluations for Spent Fuel Pool Instrumentation," the staff clarified that the interim staff evaluation (Reference 6) questions supersede any previous requests for information issued by the staff concerning the spent fuel instrumentation. Therefore, no updates to the RAIs discussed in References 3, 4, or 5 have been provided.

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## 7.0 Potential Draft Safety Evaluation Impacts

At this time, Energy Northwest does not believe there are any potential impacts to the Draft Safety Evaluation.

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