



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

May 21, 2014

Mr. Mark E. Reddemann
Chief Executive Officer
Energy Northwest
P.O. Box 968 (Mail Drop 1023)
Richland, WA 99352-0968

SUBJECT: COLUMBIA GENERATING STATION - RELAXATION OF RESPONSE DUE DATE REGARDING FLOODING HAZARD REEVALUATIONS FOR RECOMMENDATION 2.1 OF THE NEAR-TERM TASK FORCE REVIEW OF THE INSIGHTS FROM THE FUKUSHIMA DAI-ICHI ACCIDENT (TAC NO. MF3039)

Dear Mr. Reddemann:

By letter dated March 12, 2012,¹ the U.S. Nuclear Regulatory Commission (NRC) issued a request for information pursuant to Title 10 of the *Code of Federal Regulations*, Section 50.54(f) (henceforth referred to as the 50.54(f) letter). The NRC issued the request as a part of implementing lessons-learned from the accident at the Fukushima Dai-ichi nuclear power plant. Enclosure 2 to the 50.54(f) letter requested licensees to perform a reevaluation of all external flooding hazards using present-day guidance and methodologies.

By letter dated May 11, 2012,² the NRC issued a prioritization of due dates for responses from all sites. The flooding hazard reevaluation (FHR) was due on March 12, 2014, for Columbia Generating Station (CGS).

By letter dated October 4, 2013,³ Energy Northwest (the licensee) requested NRC assistance in obtaining the U.S. Army Corps of Engineers (USACE) analysis of dams that could impact the flood levels at the CGS site. By letter dated March 10, 2014,⁴ Energy Northwest requested a delay in submittal of the FHR for CGS to within 60 days of receiving the USACE final analysis. The reason for this request is that the USACE analysis is necessary to complete the FHR and 60 days is necessary to incorporate the results.

The NRC reviewed the justification provided by the licensee and considered the following factors when reviewing the new schedule:

- Columbia is currently categorized as a "dry site" in accordance with NRC Regulatory Guide 1.102 "Flood Protection for Nuclear Power Plants." The recorded history described in the licensee's Final Safety Analysis Report indicates that no historical floods have exceeded plant grade. The current limiting flooding event, probable maximum precipitation, does not reach plant grade.

¹ The 50.54(f) letter is available in the Agencywide Documents Access and Management System (ADAMS) under Accession No. ML12053A340.

² The prioritization letter is available in ADAMS under Accession No. ML12097A509.

³ The request for assistance in obtaining USACE analysis is available in ADAMS under Accession No. ML13284A075.

⁴ The extension request from Energy Northwest is available in ADAMS under Accession No. ML14080A139.

- As stated in the NRC staff's interim guidance JLD-ISG-2013-01, "Guidance for Assessment of Flooding Hazards Due to Dam Failure," dated July 29, 2013,⁵ evaluating flooding hazards for nuclear power plants needs to include consideration of floods resulting from dam failures. The FHR for CGS needs to consider dams that are operated by various government agencies including the USACE. The NRC has entered into an interagency agreement with the USACE to provide the necessary information for Energy Northwest to complete its FHR. Therefore, the FHR for CGS cannot be completed until the NRC provides the analysis of the USACE dams to the licensee.
- As stated in the NRC's letter dated March 1, 2013,⁶ "incomplete hazard reports that only contain an analysis of some flooding hazard mechanisms would not be of substantive benefit for staff and would not be acceptable." Therefore, the licensee must incorporate the information requested from the USACE before a flooding hazard reevaluation can be acceptably submitted to the NRC in compliance with the request in the 50.54(f) letter.
- The information requested from the USACE is an input to the CGS FHR. Therefore, additional time for the licensee to integrate the results into the FHR is necessary. The time requested by Energy Northwest, 60 days, is a reasonable time to complete this integration.
- The limited duration of the proposed extension (60 days after receiving the necessary information) and the fact that Columbia is currently classified as a "dry site," no historical floods have reached plant grade, and the current limiting flood does not reach grade, support the new schedule.

Given these considerations, the NRC considers the revised schedule proposed by Energy Northwest to be acceptable. Accordingly, and based upon the authority granted to the Director, Office of Nuclear Reactor Regulation, the revised required response date for submitting the hazard reevaluation report for CGS is 60 days after Energy Northwest receives the USACE final analysis. The NRC will include the date when the CGS FHR is due when the requested USACE information is transmitted to the licensee.

If you have any questions regarding this matter, or if it is necessary to revise the submittal schedule, please contact your NRC project manager, Mr. Fred Lyon, at (301) 415-2296 or via e-mail at fred.lyon@nrc.gov.

Sincerely,



Eric J. Leeds, Director
Office of Nuclear Reactor Regulation

Docket No. 50-397

cc: Listserv

⁵ JLD-ISG-2013-01 is available in ADAMS under Accession No. ML13151A153.

⁶ NRC's March 1, 2013, letter is available in ADAMS under Accession No. ML13044A561.

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 /RA/
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ADAMS Accession No. ML14098A141

*via email **Previously concurred

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Letter to Mark E. Reddemann, Energy Northwest, from Eric J. Leeds dated May 21, 2014.

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