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AUG 28 2014  
GO2-14-130

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 THIRD 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 THIRD 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 provided in Reference 2.

The attachment to this letter provides Energy Northwest's third 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 continuing to work 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 28<sup>th</sup> day of August, 2014

Respectfully,



D.A. Swank  
Assistant Vice President, Engineering

Attachment Third 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  
MA Jones – BPA/1399 (email)

**ENERGY NORTHWEST'S THIRD 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**

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

# **ENERGY NORTHWEST'S THIRD 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 third 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 February 2014, (Reference 7). Changes are identified by a revision bar in the right column or margin.

## **2.0 Milestone Accomplishments**

The following milestones have been completed since the last submittal on February 28, 2014.

1. Submittal of the Third Status Update Report for the Reliable SFP Instrumentation Integrated Plan
2. Detailed Design for the Reliable SFP Instrumentation

## **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.

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

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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	Completed	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	Aug 2014	Completed	June 2014
Commence the Reliable SFP Instrumentation Modification Installation	July 2014	Not Started	Nov 2014
Reliable SFP Instrumentation Channels Operational	Dec 2014	Not Started	June 2015

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

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<b>Program &amp; Procedures:</b>			
Develop the Reliable SFP instrumentation testing, calibration, maintenance, surveillance, and operational procedures	April 2014	Started	Jun 2015
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	Completed	N/A
Complete development of the Reliable SFP Instrumentation training modules	May 2014	Started	May 2015
Complete training of station personnel	Oct 2014	Started	Jun 2015
Functional testing of Reliable SFP Instrumentation SSCs complete	Dec 2014	Not Started	Feb 2015
Reliable SFP Instrumentation Program turned over to Operations	Dec 2014	Not Started	Jun 2015

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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. However, this concept was revised as identified in Reference 5. As a result, the reliable SFP instrumentation, primary and backup instrument channel display will only be located in the main control room. No other changes have been made to the compliance method and the design 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.

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.

## **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.

## **8.0 References**

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

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7. Letter GO2-14-030, dated February 27, 2014, from DA Swank (Energy Northwest) to NRC, "Energy Northwest's Second Six-Month Status Update Report for the Implementation of NRC Order EA-12-051 Reliable Spent Fuel Pool Instrumentation"