



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION IV
1600 E. LAMAR BLVD
ARLINGTON, TX 76011-4511

May 7, 2015

EA-15-038

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

**SUBJECT: COLUMBIA GENERATING STATION - NRC INSPECTION REPORT
05000397/2015502; PRELIMINARY WHITE FINDING**

Dear Mr. Reddemann:

On April 23, 2015, the U.S. Nuclear Regulatory Commission (NRC) completed a baseline emergency preparedness inspection of the Columbia Generating Station. The results of this inspection were discussed with Mr. B. Sawatzke, Chief Operating Officer and Chief Nuclear Officer, on April 23, 2015. The inspectors documented the results of this inspection in the enclosed inspection report.

The inspectors examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel.

The enclosed inspection report documents an NRC-identified finding that has been preliminarily determined to be White, with low to moderate safety significance that may require additional NRC inspection. The finding also constitutes an apparent violation of NRC requirements, which is being considered for escalated enforcement action in accordance with the NRC Enforcement Policy, which is available on the NRC's Web site at <http://www.nrc.gov/about-nrc/regulatory/enforcement/enforce-pol.html>.

As described in Section 1EP4 of the enclosed report, the NRC has identified that between June 16, 2014, and March 9, 2015, Columbia Generating Station failed to follow Section 5.5 of the Columbia Generating Station Emergency Plan, which requires, in part, that appropriate protective actions for an airborne release of radioactive material are evacuation and sheltering. Specifically, on June 16, 2014, when Columbia Generating Station implemented Revision 18 of its emergency plan implementing Procedure 13.2.2, "Determining Protective Action Recommendations," it inappropriately (1) removed shelter-in-place as a protective action that can be recommended to offsite authorities, (2) removed the recommendation of protective

actions for planned releases of radioactive material during an accident, and (3) limited the ability of the emergency response organization to recommend protective actions outside of the plume exposure emergency planning zone.

This finding was assessed based on the best available information, using the applicable Significance Determination Process. The NRC will inform you in writing when the final significance has been determined.

The preliminary safety significance of this finding was evaluated using Appendix B, "Emergency Preparedness Significance Determination Process," dated September 23, 2014, to Inspection Manual Chapter 0609, "Significance Determination Process." The preliminary determination of the significance of this issue was based on the NRC's conclusion that changes to Procedure 13.2.2, Revision 18, degraded Columbia Generating Station's ability to implement the risk significant planning standard functions of 10 CFR 50.47(b)(10); specifically, that a range of public protective action recommendations are available for implementation during emergencies. The NRC preliminarily determined that Columbia Generating Station's processes do not provide for protective action recommendations in accordance with its site emergency plan with respect to sheltering, planned releases, and areas outside the plume exposure emergency planning zone.

The issue is not an immediate safety concern because the licensee remains capable of recommending evacuation as a protective measure for the public when appropriate. In addition, the licensee implemented immediate guidance to staff, and initiated procedure changes to correct the issues.

In accordance with NRC Inspection Manual Chapter 0609, we intend to complete our evaluation using the best available information and issue our final safety significance determination within 90 days of the date of this letter. The NRC's significance determination process is designed to encourage an open dialogue between your staff and the NRC; however, the dialogue should not impact the timeliness of the final determination.

Before the NRC makes a final decision on this matter, we are providing you with an opportunity to (1) attend a Regulatory Conference where you can present to the NRC your perspective on the facts and assumptions the NRC used to arrive at the finding and assess its significance or (2) submit your position on the finding to the NRC in writing. If you request a Regulatory Conference, it should be held within 30 days of your receipt of this letter. We encourage you to submit supporting documentation at least one week prior to the conference in an effort to make the conference more efficient and effective. The focus of the Regulatory Conference is to discuss the significance of the finding and not necessarily the root cause(s) or corrective action(s) associated with the finding. If you choose to attend a Regulatory Conference, it will be open for public observation. If you decide to submit only a written response, it should be sent to the NRC within 30 days of your receipt of this letter. If you decline to request a Regulatory Conference or to submit a written response, you relinquish your right to appeal the final SDP determination, in that by not doing either, you fail to meet the appeal requirements stated in the Prerequisite and Limitation sections of Attachment 2 of NRC Inspection Manual Chapter 0609.

M. Reddemann

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Please contact Mr. Mark Haire, Branch Chief, Plant Support Branch 1, at 817-200-1527, and in writing, within 10 days from the issue date of this letter to notify the NRC of your intentions. If we have not heard from you within 10 days, we will continue with our significance determination and enforcement decision. The final resolution of this matter will be conveyed in separate correspondence.

Because the NRC has not made a final determination in this matter, a Notice of Violation is not being issued for this inspection finding at this time. In addition, please be advised that the characterization of the apparent violation described in the enclosed inspection report may change as a result of further NRC review.

In accordance with 10 CFR 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter, its enclosure, and your response (if any), will be made available electronically for public inspection in the NRC Public Document Room and in the NRC's Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>

Sincerely,

/RA/ Jeffrey A. Clark for

Anton Vogel, Director
Division of Reactor Safety

Docket No. 50-397
License No. NPF-21

Enclosure:
NRC Baseline Inspection Report 05000397/2015502
w/ Attachment: Supplemental Information

cc w/ encl: Electronic Distribution

Please contact Mr. Mark Haire, Branch Chief, Plant Support Branch 1, at 817-200-1527, and in writing, within 10 days from the issue date of this letter to notify the NRC of your intentions. If we have not heard from you within 10 days, we will continue with our significance determination and enforcement decision. The final resolution of this matter will be conveyed in separate correspondence.

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Division of Reactor Safety

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OFFICIAL RECORD COPY

Letter to Mark E. Reddemann from Anton Vogel, dated May 7, 2015

SUBJECT: COLUMBIA GENERATING STATION - INSPECTION REPORT
05000397/2015502; PRELIMINARY WHITE FINDING

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U.S. NUCLEAR REGULATORY COMMISSION

REGION IV

Docket: 05000397
License: NPF-21
Report: 05000397/2015502
Licensee: Energy Northwest
Facility: Columbia Generating Station
Location: Richland, Washington
Dates: August 21, 2014, through April 23, 2015
Inspectors: P. Elkmann, Senior Emergency Preparedness Inspector
G. Guerra, CHP, Emergency Preparedness Inspector
Approved By: Mark S. Haire
Chief, Plant Support Branch 1
Division of Reactor Safety

SUMMARY

IR 05000397/2015502; 08/21/2014 – 04/23/2015; Columbia Generating Station; Regional Inspection Report; 71114.04

The inspection activities described in this report were performed between August 21, 2014, and April 23, 2015, by inspectors from the NRC's Region IV office. One apparent violation was identified whose significance has preliminarily been determined to be White. The significance of inspection findings is indicated by their color (Green, White, Yellow, or Red), which is determined using Inspection Manual Chapter 0609, "Significance Determination Process." Their cross-cutting aspects are determined using Inspection Manual Chapter 0310, "Aspects Within the Cross-Cutting Areas." The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process."

Cornerstone: Emergency Preparedness

- TBD. The NRC identified three examples in which Columbia Generating Station failed to follow an emergency plan meeting the requirements of 10 CFR 50.47(b) as required by 10 CFR 50.54(q)(2). Specifically, the licensee failed to follow Sections 2.1 and 5.5 of Emergency Plan, Revisions 59 through 61, which required that the appropriate protective actions for an airborne release of radioactivity were evacuation and sheltering, that decisions to evacuate or shelter are made based on the dose avoided, that protective action recommendations are based on plant or radiological conditions, and that the authority to make protective action recommendations to offsite authorities is not delegable. The failure to follow the site emergency plan is a performance deficiency within the licensee's ability to foresee and correct. This finding is associated with an apparent violation of NRC requirements. The issue is not an immediate safety concern because the licensee remains capable of recommending evacuation as a protective measure for the public. The licensee has entered this issue into its corrective action program as Action Request 323588, dated March 9, 2015, implemented immediate guidance to staff, and initiated procedure changes to correct the issues.

The findings were evaluated using NRC Inspection Manual Chapter 0609, Appendix B, "EP Significance Determination Process," dated September 23, 2014, and preliminarily determined to be of low to moderate safety significance (White), because the performance deficiency degraded the licensee's ability to implement the risk-significant planning standard functions of 10 CFR 50.47(b)(10). The finding is more than minor because it adversely affects the cornerstone objective and is associated with the procedure quality and emergency response organization performance (program elements meet 10 CFR 50.47(b) planning standards) cornerstone attributes. The licensee's ability to implement adequate measures to protect the health and safety of the public is affected by the licensee's failure to follow emergency plan requirements to recommend a range of protective actions for the public as appropriate. The finding was assigned a cross-cutting aspect in the area of human performance associated with change management because the licensee based changes in their process to recommend protective actions for the public on an inaccurate understanding of NRC guidance and licensee staff were unaware of generic communications on the issue [H.3]. (1EP4)

REPORT DETAILS

1. REACTOR SAFETY

Cornerstone: Emergency Preparedness

1EP4 EAL and Emergency Plan Changes (71114.04)

a. Inspection Scope

The inspectors performed on-site and in-office reviews of emergency plan implementing Procedure 13.2.2, "Determining Protective Action Recommendations," Revision 18, implemented June 16, 2014. This revision implemented a scheme for making protective action recommendations for protecting the public to offsite authorities based on Supplement 3, "Guidance for Protective Action Strategies," to NUREG-0654, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," Revision 1, dated November 2011. The revised protective action scheme:

- Identified evacuation of the public as the required protective action recommendation for the public based on the results of the licensee's site-specific Evacuation Time Estimate Report, dated December 2012;
- Revised Attachment 7.1, "Decision Guide for Offsite Protective Actions," based on Supplement 3 to NUREG-0654;
- Deleted protective action recommendations for puff releases and for short-duration planned releases of radioactive material; and
- Deleted protective action recommendations made by the control room for areas outside the plume phase emergency planning zone.

The inspectors compared this revision of Procedure 13.2.2 to its previous revision; to the requirements of the Columbia Generating Station Emergency Plan, Revisions 59 through 61; to the criteria of NUREG-0654, Revision 1; to the criteria of the November 2011 version of Supplement 3 to NUREG-0654; and to the standards in 10 CFR 50.47(b) to determine if the revision adequately implemented the requirements of 10 CFR 50.54(q)(2-4) and 50.47(b)(10).

These activities constitute completion of one sample of the review of changes to emergency action levels and the emergency plan as defined in Inspection Procedure 71114.04.

b. Findings

Introduction. The NRC identified an apparent violation of 10 CFR 50.54(q)(2) for the licensee's failure to follow an emergency plan meeting the requirements of 10 CFR 50.47(b) between June 16, 2014, and March 9, 2015. The apparent violation consists of three examples of steps in emergency plan implementing Procedure 13.2.2, "Determining Protective Action Recommendations," Revision 18, which did not implement the requirements of Emergency Plan Sections 2.1 and 5.5 with respect to protective action recommendations for sheltering, planned releases, and areas outside the plume exposure emergency planning zone.

Description. The inspectors identified an apparent violation of 10 CFR 50.54(q)(2) for the licensee's failure to follow a site emergency plan meeting the requirements of 10 CFR 50.47(b). Specifically, Columbia Generating Station revised emergency plan implementing Procedure 13.2.2, "Determining Protective Action Recommendations," on June 16, 2014, so that it:

- No longer provided a mechanism to make a shelter-in-place protective action recommendation;
- No longer ensured a protective action recommendation in the event of a planned release of radioactive material; and
- Removed the responsibility of the emergency coordinator in the control room (shift manager) to make protective action recommendations for areas outside the plume phase (10-mile) emergency planning zone.

Shelter-in-Place

The inspectors identified that Revision 18 of Procedure 13.2.2 no longer provided a mechanism for making a shelter-in-place protective action recommendation even though the station's Emergency Plan required shelter to be considered.

The Columbia Generating Station Emergency Plan, Revision 59, dated September 10, 2013, through Revision 61, dated December 2014, Section 5.5, stated, "Protective Action and Responsibilities (PAR)," stated in part, "*The appropriate protective actions for an airborne release of radioactive material are evacuation and sheltering. The decision to evacuate or shelter is based on the dose to be avoided...Specifically...SHELTERING: sheltering in buildings with windows and doors closed and ventilation turned off can provide partial protection from a passing radioactive plume...*" "Sheltering" as used in 10 CFR 50.47(b)(10) is the same as "shelter-in-place" as discussed in this inspection report. "Shelter" is defined as a protective action in Appendix A to EPA-400-R-92-001, "Manual of Protective Action Guides and Protective Actions for Nuclear Incidents," dated May 1992.

Emergency Plan Section 5.5.2, "Recommendations to Counties, States, and Department of Energy Hanford," stated, in part, "...*Recommendations for evacuation and sheltering of certain areas are required upon classification of a General Emergency without regard*

to whether a radiological release is occurring...Shelter, evacuation, or access control guidelines are based on the EPA Protective Action Guidelines and NUREG-0654 Supplement 3 recommendations...Shelter may also be appropriate for special, transit-dependent populations, or during controlled, short duration releases of radioactivity..." The Emergency Plan Sections 5.5 and 5.5.2 appropriately implement the requirements of 10 CFR 50.47(b)(10) because they provide for a range of protective actions that could be recommended to offsite authorities for the protection of the public.

However, Revision 18 of Procedure 13.2.2 no longer follows the above quoted sections of the station's Emergency Plan. The inspectors reviewed emergency plan implementing Procedure 13.2.2, "Determining Protective Action Recommendations," Revision 18, including Section 4.1, "Automatic PARS at Site Area or General Emergency;" Section 4.2, "Initial Plant Based PARS for General Emergency Classifications;" Section 4.4, "Updating Offsite PARs based on Projected Doses or Offsite Survey Results;" and Attachment 7.1, "Decision Guide for Offsite Protective Action Recommendations." Based on this review, the NRC concluded that the revised procedure did not provide any decision path or evaluation criteria that resulted in a recommendation to shelter members of the public as a protective measure to protect against airborne radioactive material. The licensee confirmed in a February 17, 2015, conference call that the revised procedure would not result in recommending sheltering to offsite authorities as a protective measure for the public.

The licensee contended that Attachment 7.1 still provides for direction to consider a sheltering protective action recommendation under some circumstances, but the term, "shelter," as used in Attachment 7.1, does not match the intent of the Emergency Plan to consider sheltering as a dose avoidance protective action. In addition, the Environmental Protection Agency's "PAG Manual, Protective Action Guides and Planning Guidance for Radiological Incidents," dated March 2013, defines a protective action as, "an activity conducted in response to an incident or potential incident to avoid or reduce radiation dose to members of the public." In contrast, the Attachment 7.1 flowchart stated, "*evacuate all sections 0-2 miles and 10 miles downwind AND shelter remaining sections,*" which is similar to the term 'monitor and prepare' used in Supplement 3 to NUREG-0654. The licensee confirmed during a February 17, 2015, conference call that the licensee's use of 'shelter' in Attachment 7.1 did not connote a protective measure.

The inspectors determined that Revision 18 of plant Procedure 13.2.2 removed Step 4.3.5 which stated, in part, "*For a planned puff release or known impediment, refer to the summary of results of evacuation times analysis, Attachment 7.3, for the affected sections to determine if prompt evacuation or sheltering with delayed evacuation is appropriate...*" The licensee mistakenly determined in an evaluation, dated June 16, 2014, that removal of a shelter recommendation for a puff release continued to meet the requirements of 10 CFR 50.47(b) and of the site emergency plan. The licensee based this determination on its conclusion that Supplement 3 to NUREG-0654 did not require protective action recommendations for puff releases for licensees with sufficiently short evacuation time estimates. Specifically, Supplement 3, Section 2.7, "Strategy for Rapidly Progressing Scenarios," recommended immediate evacuation if the 90 percent evacuation time estimate is 3 hours or less. The licensee mistakenly stated during a

February 17, 2015, conference call that (1) a puff release as used in Procedure 13.2.2, Revision 17, was equivalent to a rapidly progressing scenario as used in Revision 18 and (2) the licensee's maximum 90-percent evacuation time under any scenario is 2 hours 15 minutes. Because the licensee's maximum 90-percent evacuation time estimate is less than 3 hours, the licensee mistakenly concluded that immediate evacuation was to be recommended to offsite authorities under any circumstance.

The inspectors determined that Columbia Generating Station did not correctly apply the guidance of Supplement 3, Section 2.7. Specifically, the licensee erred in identifying that a puff release was equivalent to a rapidly progressing scenario. A rapidly progressing scenario refers to an accident that causes significant core damage within the first hour (e.g., the time before the staffing of offsite emergency response facilities could be achieved). A rapidly progressing scenario is not associated with any specific release of airborne radioactive materials into the environment; although, it could lead to a large early release. A puff release refers to a short-duration release of airborne radioactive material into the environment, which could be planned and controlled by the licensee, but could also be an unintended consequence of the accident. A puff release is not associated with any particular degree of core damage and could occur with source terms ranging from reactor coolant without core damage (e.g., very low dose consequences) through a severe accident (e.g., very significant dose consequences). Therefore, although Supplement 3 to NUREG-0654 advises that evacuation is an appropriate protective action recommendation for rapidly progressing events at the station (since the evacuation time estimate is less than 3 hrs), it is not appropriate to eliminate all consideration for sheltering as a protective action since sheltering may still be, under some circumstances (like some puff release scenarios), the correct dose-avoidance protective action.

Based on the above, the inspectors concluded that the removal of shelter-in-place as a protective measure that could be recommended to offsite authorities was not in accordance with the Columbia Generating Station Emergency Plan, Section 5.5. Specifically, the lack of a shelter recommendation was not in accordance with the statement, "*The appropriate protective actions for an airborne release of radioactive material are evacuation and sheltering. The decision to evacuate or shelter is based on the dose to be avoided.*"

Planned Releases of Radioactive Material

Revision 18 of Procedure 13.2.2 removed direction to issue a protective action recommendation to offsite authorities for a planned puff release. Procedure 13.2.2, Revision 17, Step 4.3.5, stated, in part, "*For a planned puff release or known impediment refer to...Attachment 7.3, for the affected section to determine if prompt evacuation or sheltering with delayed evacuation is appropriate...*" Procedure 13.2.2, Revision 18, Step 4.4.4, states, in part, "*IF there is to be a planned release (containment venting) THEN discuss the proposed activity with offsite authorities to assist them with protective action implementation.*" Revision 18, Step 4.4.5, states, in part, "*WHEN circumstances such as weather, distance, or concurrent emergencies may impact specific areas for which PARs are being proposed, THEN inform the Benton and Franklin County EOFs...*" The inspectors determined that Revision 17 required the

licensee make a protective action recommendation to offsite authorities for planned releases of radioactive material into the environment, while Revision 18 requires the licensee to discuss a planned release with offsite authorities. The inspectors concluded that a discussion intended to assist offsite authorities is not equivalent to a protective action recommendation from the licensee to offsite authorities. The inspectors also concluded that Revision 17 directed the emergency response organization to take known impediments into consideration in deciding between recommendations for shelter and evacuation, while Revision 18 does not direct consideration of impediments.

Based on the above, the inspectors concluded that the removal of the requirement to make a protective action recommendation for protecting the public in the event of a planned release of radioactive material is not in accordance with the Columbia Generating Station Emergency Plan, Section 5.5.2. Specifically, the lack of a protective action recommendation for the public in the event of a planned release was not in accordance with the statement, *“Energy Northwest will make prompt recommendations for protective actions to state, county, and DOE-RL officials... Protective action recommendations will be made based on plant or radiological conditions.”*

Protective Measures for areas outside the plume Emergency Planning Zone

Revision 18 of Procedure 13.2.2 removes the responsibility for protective action recommendations from the Emergency Coordinator in the control room and delegates the responsibility to “the TSC or EOF.” Procedure 13.2.2, Revision 18, Section 4.5, “Protective Action Recommendations beyond 10 Miles,” Step 4.5.1, states, *“For the Control Room, NOTIFY the offsite agencies via the Crash Phone that dose projections indicate that PAGs beyond 10 miles may be exceeded. Indicate that the TSC or EOF will formulate PARs for affected areas.”*

The inspectors determined that Step 4.5.1, Bullet 1, inappropriately delegates responsibility for protective action recommendations from the Emergency Coordinator in the Control Room to the Technical Support Center or Emergency Operations Facility. Step 4.5.1 could cause a delay in the recommendation of necessary protective actions to offsite authorities if the Technical Support Center and Emergency Operations Facility are not staffed when a recommendation is required.

Based on the above, the inspectors concluded that Revision 18 of Procedure 13.2.2 was not in accordance with the Columbia Generating Station Emergency Plan, Section 5.5.2. Specifically, limitations on making protective action recommendations for areas outside of the planning zone were not in accordance with the statement, *“Energy Northwest will make prompt recommendations for protective actions to state, county, and DOE-RL officials... Protective action recommendations will be made based on plant or radiological conditions.”* The reassignment of responsibility to develop protective action recommendations for the public in areas outside of the emergency planning zone to the Technical Support Center or Emergency Operations Facility also does not follow Section 2.1 of the emergency plan which states, in part, *“...Responsibility for emergency direction and control (i.e., overall direction of the plant’s emergency response which must include the non-delegable responsibilities for emergency classification, the decision to notify and to recommend protective actions to authorities responsible for offsite*

emergency measures) is normally transferred from the Shift Manager to the EOF Manager...” When the Emergency Director function resides in the control room, Revision 18 of Procedure 13.2.2 improperly delegates the non-delegable responsibility for making protective action recommendations to the Technical Support Center or Emergency Operations Facility.

Analysis. The licensee’s failure to follow the requirements of the site emergency plan is a performance deficiency within the licensee’s ability to foresee and correct. The finding is more than minor because it adversely affects the cornerstone objective and is associated with the procedure quality and ERO performance (program elements meet 10 CFR 50.47(b) planning standards) cornerstone attributes. The removal of shelter as a possible protective action for the public in the emergency planning zone, the removal of protective action recommendations for planned releases, and limitations on protective action recommendations for areas outside the emergency planning zone could affect the licensee’s ability to implement adequate measures to protect the health and safety of the public.

The finding has been evaluated using Inspection Manual Chapter (IMC) 0609, Appendix B, “Emergency Preparedness Significance Determination Process,” dated September 23, 2014, and was preliminarily determined to be of low to moderate safety significance (White) because it constituted a degraded risk-significant planning standard. The planning standard function was degraded because, although the licensee could make appropriate recommendations for evacuation of the public, the licensee could no longer make recommendations for the public to shelter-in-place when appropriate, and limitations could result in delays in making appropriate protective action recommendations for areas outside the emergency planning zone. The finding was assigned a cross-cutting aspect in the area of human performance associated with change management because the licensee based changes to plant Procedure 13.2.2, “Determining Protective Action Recommendations,” Revision 18, on an inaccurate understanding of available NRC guidance about shelter-in-place [H.3].

Enforcement. Title 10 of the Code of Federal Regulations, Part 50.54(q)(2) requires, in part, that a holder of a licensee under 10 CFR Part 50 shall follow and maintain the effectiveness of an emergency plan that meets the requirements of Appendix E to 10 CFR Part 50, and the planning standards of 10 CFR 50.47(b). Title 10 CFR Part 50.47(b)(10) requires, in part, that a range of protective actions has been developed for the plume exposure pathway emergency planning zone for the public. In developing this range of protective actions, consideration has been given to evacuation and sheltering, as appropriate.

Columbia Generating Station Emergency Plan, Revision 59, dated September 10, 2013, through Revision 61, dated December 2014, Section 2.1, “Organizational Concepts,” required, in part, that the responsibility for emergency direction and control, comprises the overall direction of the plant’s emergency response, which must include the non-delegable responsibilities for emergency classification, the decision to notify and to recommend protective actions to authorities responsible for offsite emergency measures. Columbia Generating Station Emergency Plan, Section 5.5, “Protective Actions and Responsibilities,” required, in part, that the appropriate protective actions for

an airborne release of radioactive material are evacuation and sheltering; and that the decision to evacuate or shelter is made based on the dose to be avoided by the protective action relative to the risk associated with implementing a protective action; and that protective action recommendations will be made based on plant or radiological conditions.

Contrary to the above, between June 26, 2014, and April 23, 2015, Columbia Generating Station failed to follow and maintain the effectiveness of an emergency plan meeting the requirements of Appendix E to 10 CFR Part 50 and 10 CFR 50.47(b). Specifically, Columbia Generating Station Procedure 13.2.2, "Determining Protective Action Recommendations," Revision 18, Section 4.5.1, did not implement the requirements of Emergency Plan Section 2.1 because the procedure required the Emergency Director in the control room to delegate the formulation of protective action recommendations to the TSC or EOF. However, protective actions are a non-delegable responsibility of the Emergency Director. Procedure 13.2.2, Revision 18, did not implement the requirements of Emergency Plan Section 5.5 because it did not provide for the development of shelter-in-place as a protective action recommendation and did not provide for protection action recommendations to protect against planned releases of radioactive materials. The licensee has entered this issue into their corrective action process as Action Requests 320790, dated January 19, 2015; 323588, dated March 9, 2015; and 325158, dated April 2, 2015. AV 05000397-2015502-01 (Failure to follow an emergency plan requirement to provide for a shelter as a protective action for the public)

4. OTHER ACTIVITIES

40A6 Meetings

Exit Meeting Summary

On April 23, 2015, the inspectors conducted a telephonic exit meeting to present the results of the in-office and on-site inspection of changes to the licensee's procedure for making protective action recommendations for the public to offsite authorities to Mr. W. Hettel, Vice President, Operations, and other members of the licensee staff. The licensee acknowledged the issues presented.

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee Personnel

W. Hettel, Vice President, Operations
A. Javorik, Vice President, Engineering
M. Kellet, Assistant to Vice President, Operations
R. Schuetz, General Plant Manager
S. Clizbe, Manager, Emergency Preparedness
R. Fahnestock, Program Manager, Emergency Preparedness
D. Gregoire, Manager, Regulatory Affairs
R. Prewett, Manager, Operations
D. Suarez, Engineer, Regulatory Compliance
J. Dobken, Senior Analyst, Public Affairs

NRC Personnel

J. Groom, Senior Resident Inspector
R. Kahler, Branch Chief, NSIR/DPR/IRIB
E. Schrader, Emergency Preparedness Specialist, NSIR/DPR/IRIB
R. Sullivan, Senior Emergency Preparedness Specialist, NSIR/DPR/IRIB

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

05000397/2015502-01	AV	Failure to follow an emergency plan requirement to provide for a shelter as a protective action for the public (Section 1EP4)
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LIST OF DOCUMENTS REVIEWED

Section 1EP4: EAL and Emergency Plan Changes

Procedures and Documents

<u>Number</u>	<u>Title</u>	<u>Revision/Date</u>
	50.54(q) Effectiveness Review, AR 295272-010	June 16, 2014
	Rationale for Adopting Evacuation Protective Action Recommendation for a Postulated "Puff Release" at Columbia	November 24, 2014
	Overview of 2014 Revision to PARs training material	January 19, 2015
	Action Request 00320790	January 19, 2015
EP000226	Computer Based Training Module, "Protective Action Recommendations, PPM 13.2.1, PPM 13.2.2"	14

Action Requests (corrective action program)

320790	323588	325158
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