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December 21, 2015  
GO2-15-168

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

**SUBJECT: COLUMBIA GENERATING STATION, DOCKET NO. 50-397  
COMMITMENT TO MAINTAIN SEVERE ACCIDENT GUIDELINES**

Dear Sir or Madam:

The Nuclear Energy Institute (NEI) Nuclear Strategic Issues Advisory Committee (NSIAC) recently approved an Industry Initiative to implement and maintain Severe Accident Guidelines (SAGs). By this letter Energy Northwest establishes commitments related to SAGs for Columbia Generating Station (Columbia). These guidelines would be used by emergency response personnel during accident conditions that progress beyond the mitigation capabilities described in Emergency Operating Procedures (EOPs). SAG strategies are intended to arrest the progression of fuel damage, maintain the capability of the containment as long as possible, and minimize radiological releases. The new SAG commitments are listed in Attachment 1.

It is expected that NRC staff personnel will conduct periodic inspection of our SAGs and performance deficiencies, if any, will be assessed using the Reactor Oversight Process (ROP). We also understand that inspection activities will not extend to NRC review and approval of SAG strategies, or the use of equipment described in the SAGs.

If you should have any questions regarding this submittal, please contact Ms. L. L. Williams, Licensing Supervisor, at 509-377-8148.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 12/21/15.

Respectfully,

W. G. Hettel  
Vice President, Operations

Attachments: As stated

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cc: NRC RIV Administrator  
NRC NRR Project Manager  
NRC Senior Resident Inspector - 988C  
CD Sonoda - BPA - 1399 (w/o enclosure)  
WA Horin - Winston & Strawn (w/o enclosure)  
D Young – NEI

**List of Commitments**

The following table identifies the regulatory commitments in this document. Any other statements in this submittal regarding intended or planned actions are provided for information purposes and are not considered to be regulatory commitments. Please direct questions regarding these commitments to Ms. L. L. Williams, Licensing Supervisor, at 509-377-8148.

COMMITMENT	TYPE (Check One)		COMPLETION DATE
	ONE-TIME ACTION	CONTINUING COMPLIANCE	
Columbia SAGs will be considered within plant configuration management processes in order to ensure that the SAGs reflect changes to the facility over time.		X	October 31, 2016
Columbia will update the site SAGs to revision 3 of the BWROG generic severe accident guidelines (published February, 2013).	X		Completed*
Columbia will update the site SAGs to future revisions of the BWROG generic severe accident technical guidelines, and the SAGs will be integrated with other emergency response guideline sets and symptom-based Emergency Operating Procedures, and validated, using the guidance in NEI 14-01, <i>Emergency Response Procedures and Guidelines for Beyond Design Basis Events and Severe Accidents</i> . <sup>1</sup>		X	Within 2 refueling outages or 3 years of the publication date of the guidelines, whichever is greater

<sup>1</sup> – Use of NEI 14-01 guidance begins with the update to revision 4 of the BWROG generic severe accident guidelines.

\* – This one-time action is required by June 30, 2017. Energy Northwest has completed this commitment.