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August 3, 2017
GO2-17-141

10 CFR 2.201

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

**Subject: COLUMBIA GENERATING STATION, DOCKET NO. 50-397
REPLY TO A NOTICE OF VIOLATION; EA-17-028**

Reference: Letter EA-17-028 from K Kennedy (NRC) to ME Reddemann (Energy Northwest), "Columbia Generating Station – Final Significance Determination of a White Finding, Notice of Violation, Follow-Up Assessment Letter and NRC Inspection Report 05000397/2017009," dated July 6, 2017.

Dear Sir or Madam:

As required by 10 CFR 2.201, this letter provides Energy Northwest's reply to Notice of Violation EA-17-028 cited in the referenced Nuclear Regulatory Commission (NRC) inspection report (Reference). The response, as described in the enclosure, includes the reason for the violation, the corrective steps that have been taken and the results achieved, the corrective steps that will be taken, and the date when full compliance was achieved.

There are no commitments being made to the NRC by this letter. Should you have any questions, please contact DM Wolfgramm, Regulatory Compliance Supervisor, at (509) 377-4792.

Executed this 3rd day of AUGUST, 2017

Respectfully,

W. G. Hettel
Vice President, Operations

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Enclosure: Response to EA-17-028 Notice of Violation

cc:

NRC Director-Division of Reactor Safety, Region IV

NRC Region IV Administrator

NRC NRR Project Manager

NRC Sr. Resident Inspector/988C

CD Sonoda – BPA/1399 w/o enclosure

WA Horin - Winston & Strawn w/o enclosure

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Enclosure
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Columbia Generating Station
Reply to EA-17-028 Notice of Violation

Notice of Violation

NRC letter EA-17-028 dated July 6, 2017, cited the violation as stated below.

10 CFR 71.5(a) requires, in part, that each licensee who transports licensed material outside the site of usage, as specified in the NRC license, or where transport is on public highways, shall comply with the applicable requirements of the Department of Transportation regulations in 49 CFR Parts 171 through 180.

49 CFR 173.427(a)(1) requires, in part, that low specific activity material must be transported in accordance with the condition that the external dose rate may not exceed an external radiation level of 10 mSv/hr (1 rem/hr) at 3 meters (10 feet) from the unshielded material.

Contrary to the above, on November 9, 2016, the licensee failed to transport low specific activity material in accordance with the condition that the external dose rate may not exceed an external radiation level of 10 mSv/hr (1 rem/hr) at 3 meters (10 feet) from the unshielded material. Specifically, the licensee transported a package as low specific activity material with an external radiation level of 2.1 rem/hr at a distance of 3 meters from the unshielded material.

Energy Northwest accepts this violation, has taken prompt action to return to full compliance, and has implemented comprehensive corrective actions for long-term sustained compliance.

Reason for Violation

The root cause of the violation was determined to be that station procedures to implement spent fuel pool clean-up activities and the associated radioactive waste surveys, processing, and shipping activities were not sufficient to ensure compliance with all requirements, specifically 10 CFR 71.5(a) and 49 CFR 173.427(a)(1). Contributing causes were that key decisions lacked rigorous challenge and vetting and were non-conservative, and a lack of adequate management oversight for the clean-up activities as well as the Radioactive Waste Shipping and Handling Program.

Corrective Steps and Results Achieved

Upon notification of the non-conforming condition immediate action was taken to return the shipment to Columbia which arrived onsite at 1545 PST on November 9, 2016 restoring compliance.

The following are corrective actions that have been taken:

- The station has developed and issued a detailed procedure for spent fuel pool clean-up activities integrated with associated Radioactive Waste Shipping and Handling procedures and ensures all roles and responsibilities for all affected departments are clearly defined, including who has decision-making authority;
- Prior to the detailed procedure implementation, radioactive waste shipments were reviewed and approved by the Radiation Protection Manager prior to transport;
- A peer self-assessment was performed of the Radioactive Waste Shipping and Handling Program with an industry peer and expert to identify performance vulnerabilities in the current program and to identify where gaps existed between Columbia radioactive waste shipping practices and industry standard practices. Recommendations have been evaluated and actioned appropriately;
- Filters located in the spent fuel pool were inventoried for proper tracking and disposal;
- Past radioactive waste shipments were reviewed for evidence of any incorrect characterizations, problems with documentation or violations that were not adequately addressed or that would warrant additional actions. Several minor documentation issues were identified and for one shipment a corrected manifest was provided to US Ecology;
- Self-Assessments were performed or are scheduled for three infrequently performed processes or projects, involving high risk and potential impact.

Since the event which led to the notice of violation there have been no events in which radioactive waste was transported with external dose rates contrary to 49 CFR Part 173.427(a)(1).

Corrective Steps that Will be Taken

Energy Northwest will systematically remove and inventory all items from the container in question and will perform characterization of the items prior to transportation and disposal.

Date of Full Compliance

Full compliance with 10 CFR 71.5(a) and 49 CFR 173.427(a)(1) was achieved on November 9, 2016 at 1545 PST when the container in question was received at Columbia following notification of the non-conforming condition.