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July 24, 2018
GO2-18-094

10 CFR 50.54(q)
10 CFR 72.44(f)

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 205551

Subject: **COLUMBIA GENERATING STATION, DOCKET NO. 50-397
INDEPENDENT SPENT FUEL STORAGE INSTALLATION, DOCKET NO. 72-35
SUMMARY OF CHANGES AND ANALYSIS FOR REVISION 39 OF PPM 13.8.1
EMERGENCY DOSE PROJECTION SYSTEM OPERATIONS**

Dear Sir or Madam:

Enclosed is the summary of changes and analysis for Revision 39 of Plant Procedures Manual 13.8.1 Emergency Dose Projection System Operations issued on July 3, 2018. The changes to the Plant Procedures Manual (PPM) have been evaluated in accordance with 10 CFR 50.54(q) and 10 CFR 72.44(f). The PPM, as revised, continues to meet the standards of 10 CFR 50.47(b) and the requirements of 10 CFR 50 Appendix E. The Enclosure contains a summary of changes and evaluations performed. Each change was evaluated in accordance with the station's 10 CFR 50.54(q) evaluation process. These changes do not create a reduction in effectiveness (RIE) of the approved emergency plan.

This submittal contains no new or revised regulatory commitments. Should you have any questions or desire additional information regarding these matters, please contact Sean E. Clizbe at (509) 377-4398.

Executed on the 24th day of July, 2018.

Respectfully,

A handwritten signature in black ink, appearing to read "D. W. Gregoire".

D. W. Gregoire
Manager, Regulatory Affairs

Enclosure: Summary of Changes and Analysis

cc: NRC Region IV Administrator
NRC NRR Project Manager
NRC Sr. Resident Inspector / 988C
Director – Spent Fuel Storage & Transportation, NMSS
CD Sonoda, BPA / 1399 (email)
WA Horin – Winston & Strawn (email)

Summary of Changes and Analysis

Revision 39 of Plant Procedures Manual 13.8.1 Emergency Dose Projection System Operations relocates guidance on the use of the Detailed URI program to an attachment. This change enhances the ability of the user to find this direction in an attachment versus in the body of the procedure. Additional changes include new Notes that provide guidance on system response during a loss of divisional power and a Note that describes operation of the PRM Stack Monitor sample rack. These changes do not reduce the effectiveness of the Emergency Plan and the Plan continues to meet the requirements in appendix §50 Appendix E and the planning standards of § 50.47(b).