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GO2-20-006

10 CFR 50.54(q)

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 44 OF PPM 13.4.1  
EMERGENCY NOTIFICATIONS**

Dear Sir or Madam:

Enclosed is the summary of changes and analysis for Revision 44 of Plant Procedures Manual (PPM) 13.4.1 Emergency Notifications issued on February 11, 2020. The changes to the 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 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 Stephen M. Sullivan at (509) 377-8019.

Executed on the 11 day of February, 2020.

Respectfully,

D. W. Gregoire *D. Wolfgramm Acting*  
Manager, Regulatory Affairs

Enclosure: Summary of Changes and Analysis

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

## **Enclosure**

### **Summary of Changes and Analysis**

Summary of Changes to procedure PPM 13.4.1 Rev 43 to Rev 44, this revision:

- Arranges the procedure to be more user friendly within the progression from the Main Control Room (MCR) to the Emergency Response Organization (ERO) Centers, and maintains the requirements of the CGS Emergency Plan (EPlan).
- Aligns "Transitory Event Classification Reporting" with the description given in Plant Procedures Manual 13.1.1a Classifying the Emergency – Technical Basis, and NUREG 1022 Rev.3, for the required actions for a missed condition where an Emergency was not declared and the condition no longer exists.
- Adds a new section for "Notifications of Suspended Security Measures," which was previously contained only within the Shift Managers section.
- Adds a step in each of the sections of the Shift Manager, Emergency Operations Facility (EOF) Manager and Technical Support Center (TSC) Manager, to note the time the immediate notification to Off-site Response Organizations (OROs) is completed.
- Adds direction in Attachment 7.1 "Emergency Notification Lists Part - A- Immediate Notification List," for which form to use for immediate notifications, "Main Control Room" or "Outside the Main Control Room."
- Adds directions in Attachment 7.2 "Emergency Notification Lists Part - B- ERO Notification List," for ERO Notification when the Security Communications Center (SCC) or MCR is not available.
- Adds directions in Attachment 7.3 "Emergency Notification Part -C- Offsite Notification," to use Form 27177, Energy Northwest Part C - Offsite Support Agency Notification, for Offsite Support Agency notification.
- Revises Attachment 7.4 "ERO Notification and Respond" to better inform the different ERO Categories of the expected response when paged or notified.
- References new Form 27098, "Emergency Notifications From Outside the Main Control Room," to be used by the ERO centers to make the Immediate Notification calls to OROs.
- Made minor changes to format to upgrade the procedure to the requirement of SWP-PRO-03.

#### **Analysis:**

The rearrangement of the procedure and addition of Form 27098; Emergency Notifications From Outside the Main Control Room, will assist the Emergency Response Organizations (EOF and TSC) in a timelier response for the Initial Message to the OROs when a reclassification occurs and the notification is made from the EOF or TSC. The addition of Form 27177, Energy Northwest Part C - Offsite Support Agency Notification, will assist the SCC and Site Support Manager in making Notifications to Offsite Support Agencies in a timelier manner. No changes to the CGS EPlan were made and changes to the procedure do not change commitments, timeliness, or capability for providing OROs and ERO center notifications, and therefore; these changes do not constitute a reduction in effectiveness to the CGS EPlan.