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December 3, 2020
GO2-20-150

10 CFR 73.5

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

Subject: **COLUMBIA GENERATING STATION, DOCKET NO. 50-397
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION
RELATED TO REQUEST FOR A ONE-TIME EXEMPTION FROM 10
CFR 73, APPENDIX B, SECTION VI, SUBSECTION C.3.(I)(1)
REGARDING ANNUAL FORCE-ON-FORCE EXERCISES, DUE TO
COVID-19 PANDEMIC**

- References:
1. Letter from R.E. Schuetz, Energy Northwest to NRC, "Request for a One-Time Exemption from 10 CFR 73, Appendix B, Section VI, Subsection C.3.(I)(1) Regarding Annual Force-On-Force Exercises, due to COVID-19 Pandemic," dated October 29, 2020 (ADAMS Accession Number ML20303A286).
 2. Email from M. Chawla, NRC to Richard Wynegar, Energy Northwest, "FINAL - Request for Additional Information - Columbia Generating Station - One - Time Exemption From 10 CFR 73, Appendix B, Section VI, Subsection C.3.(I)(1) Regarding Annual Force-On-Force Exercises Due to COVID-19 Pandemic - EPID L-2020-LLE-0172," dated November 30, 2020.

Dear Sir or Madam:

By Reference 1, Energy Northwest submitted a request for a one-time exemption from the annual force-on-force requirement of 10 CFR Part 73, Appendix B, Section VI, Subsection C.3.(I)(1). By Reference 2, the Nuclear Regulatory Commission requested additional information related to the Energy Northwest submittal. The enclosure to this letter contains the requested information.

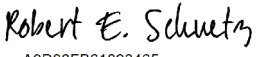
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No new commitments are being made by this letter or the enclosure. If there are any questions or if additional information is needed, please contact Mr. Trevor W. Phelps, Security Operations Manager, at (509) 377-2184.

Executed this 3 day of December, 2020.

Respectfully,

DocuSigned by:

A0D08FB61898465...
R.E. Schuetz
Site Vice President

Enclosure: As stated

cc: NRC Region IV Administrator
NRC NRR Project Manager
NRC Sr. Resident Inspector
CD Sonoda - BPA

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Enclosure

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RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

NRC REQUEST Question 1:

Describe the site-specific condition(s), including site-specific COVID-19-related impacts, that will prevent Energy Northwest from completing its CY 2020 annual force-on-force (FOF) exercise prior to December 31, 2020.

ENERGY NORTHWEST RESPONSE TO Question 1:

COVID-19 cases have been trending upward in local Benton and Franklin counties, as well as in Washington State. As a result of the increase in COVID-19 cases in Washington, Jay Inslee, the governor of Washington State, has enacted new restrictions. These restrictions are related to both travel and group size limitations.

As noted above, there has been a recent rise in cases of COVID-19 in local Benton and Franklin counties where the majority of station personnel reside. The station has also seen a recent rise in COVID-19 cases of station personnel. To date, through contact tracing, Energy Northwest has determined that none of these cases have been tied to transmission at the station and have been due to home or community contact.

Due to the increasing trend of cases in state and local counties, along with a rise in cases of station personnel, Energy Northwest management has increased nonessential employee telecommuting where possible. Additionally, all meetings, including core business meetings, are being conducted virtually to the fullest extent possible during this timeframe.

Specifically, Energy Northwest's pandemic plan has impacted the stations ability to perform the 2020 annual FOF exercises safely due to the following:

- COVID-19 mitigation techniques of maintaining social distancing, mask use, minimizing human footprint on site, and limiting close personal contact of employees during the conduct of work activities where possible are essential elements of mitigating onsite transmission of the virus.
- Modifications have been made in order to lower the number of individuals onsite, protect essential site personnel, and lower the probability of an outbreak at the site which could affect safe and reliable operation of the station.
- Current site COVID-19 mitigation techniques described above would challenge the ability for multiple personnel to be located within security posts.
- A significant number of security controllers used during FOF Exercises are non-essential employees which are telecommuting due to site COVID-19 restrictions.