David P. Brown
Site Vice President
P.O. Box 968, PE23
Richland, WA 99352-0968
Ph. 509-377-8385 F. 509-377-4150
dpbrown@energy-northwest.com

July 27, 2023
GO2-23-093

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**
SUPPLEMENT TO REPLY TO A NOTICE OF VIOLATION; EA-21-170

References: (1) Letter from D Brown (Energy Northwest) to US Nuclear Regulatory Commission, "Reply to a Notice of Violation; EA-21-170," ML23193B032, GO2-23-090, dated July 12, 2023.

(2) Letter from R Lewis (NRC) to R Schuetz (Energy Northwest), “Columbia Generating Station – Final Significance Determination of a White Finding, Notice of Violation and Follow-Up Assessment Letter; NRC Inspection Report 05000397/2023090,” ML23111A237, dated June 1, 2023.

Dear Sir or Madam:

Energy Northwest is hereby submitting this supplement to its July 12, 2023, letter (Reference 1) in accordance with the July 6, 2023, telecon with U.S. Nuclear Regulatory Commission (NRC) Region IV.

This response contains additional information not available at the time of the initial letter pertaining to the second and third violations noted in the NRC letter dated June 1, 2023 (Reference 2). The responses for the second and third violations, described in the enclosure, include 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 IR Bitner, Regulatory Compliance Supervisor, at (509) 377-4204.

Executed this 27th day of July, 2023

Respectfully,

David P Brown

David P. Brown
Site Vice President

Enclosure: Supplement to Reply to EA-21-170 Notice of Violation

cc: NRC Director-Division of Operating Reactor Safety, Region IV
NRC Region IV Administrator
NRC NRR Project Manager
NRC Resident Inspector/988C
NRC Enforcement, Region IV
CD Sonoda – BPA/1399 w/o enclosure

GO2-23-093
Enclosure

Columbia Generating Station – Energy Northwest
Supplement to Reply to EA-21-170 Notice of Violation

As noted in Energy Northwest's July 12, 2023, letter to the U.S. Nuclear Regulatory Commission (NRC) (Reference 1), Energy Northwest accepts these violations, has taken prompt action to return to full compliance and has implemented comprehensive corrective actions for long-term sustained compliance related to the violation of 10 CFR 20.1701.

The root cause evaluation conducted to better evaluate the violations of Technical Specification 5.7.2.b and 10 CFR 20.1501(a)(2) was completed and required responses for these two violations are show below.

NRC letter dated June 1, 2023, (Reference 2) cited three violations of NRC requirements.

A. Violation of 10 CFR 20.1701

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 for this violation were submitted as part of the July 12, 2023, letter from Energy Northwest to the NRC (Reference 1) and therefore will not be duplicated as part of this supplement.

B. Violation of Technical Specification 5.7.2.b

Notice of Violation

Technical Specification 5.7.2.b requires, in part, that access to, and activities in, each high radiation area with dose rates greater than 1.0 rem/hour at 30 centimeters from the radiation source shall be controlled by means of a radiation work permit.

Radiation work permit 30004732, created to control activities in a Technical Specification 5.7.2.b high radiation area, required, in part, that continuous Health Physics job coverage is provided when personnel are entering and working in areas with dose rates greater than 0.8 rem/hour.

Contrary to the above, on May 28, 2021, the licensee failed to control the activities in a high radiation area with dose rates greater than 1.0 rem/hour at 30 centimeters from the radiation source in accordance with radiation work permit 30004732. Specifically, the licensee failed to follow radiation work permit 30004732 and provide continuous Health Physics job coverage when personnel entered and worked in an area with dose rates greater than 0.8 rem/hour (i.e., 1.3 rem/hour at 30 centimeters from the radiation source). A radiation protection technician, scheduled to provide the continuous Health Physics job coverage, was unable to physically fit on the work area platform and left the workers unattended in the area. A second radiation protection technician subsequently

replaced the original technician as the workers were conducting job activities in the work area.

Reason for Violation

The direct cause identified was inadequate adherence and implementation of station and department-level instructions, policies, and procedures which resulted in approval and implementation of plans that were not appropriate to support successful performances of infrequently performed activities, were insufficient to mitigate risk, or included error traps.

Additionally, disposition of adverse events by the Radiological Services group (by application of the station corrective action program) was not performed in a manner which facilitated identification and resolution of systemic level shortcomings in station radiological controls.

Radiological Services resources were challenged to ensure correct implementation of planned work in all cases.

Corrective Steps and Results Achieved

Energy Northwest recently completed an additional root cause evaluation as noted in the original response (Reference 1). Additional corrective actions including those to prevent recurrence have been identified below.

Corrective Steps that Will be Taken

Actions to be taken include:

- Develop and implement a required formal as low as reasonably achievable (ALARA) plan review tool for elevated and high radiological risk activities.
- Revise Corrective Action program procedures, instructions, and related guidance to preclude use of human error or culpability for root, apparent, and contributing causes and analytical products.
- Develop a job familiarization guide (JFG) with specific focus on management of Radiological Services outage resources.

Date of Full Compliance

Full compliance was achieved on May 29, 2021, upon approval of return-to-work criteria.

C. Violation of 10 CFR 20.1501(a)(2)

Notice of Violation

10 CFR 20.1501(a)(2) requires, in part, that licensees shall make surveys of areas that are reasonable under the circumstances to evaluate the magnitude and extent of radiation levels; and concentrations or quantities of residual radioactivity.

Contrary to the above, on May 27, 2021, the licensee failed to make surveys of areas that were reasonable under the circumstances to evaluate the magnitude and extent of radiation levels; and concentrations or quantities of residual radioactivity. Specifically, the licensee failed to adequately determine the work area radiation levels as documented in survey M-20210528-13, which stated, the survey “was not an extensive search for the highest exposure rate.” In addition, the licensee failed to adequately evaluate the extent of contamination levels on the piping prior to the work activity. The surveys completed prior to the event did not adequately identify work area dose rates and did not identify appropriate contamination levels, resulting in a lower risk rating to the job and less rigorous radiological controls for the activity.

Reason for Violation

The cause identified was ineffective enforcement of station/department standards, policies, and administrative controls, due to inadequate review and approval processes.

Additionally, disposition of adverse events by the Radiological Services group (by application of the station corrective action program) was not performed in a manner which facilitated identification and resolution of systemic level shortcomings in station radiological controls.

Radiological Services resources were challenged to ensure correct implementation of planned work in all cases.

Corrective Steps and Results Achieved

Energy Northwest recently completed an additional root cause evaluation as noted in the original response (Reference 1). Additional corrective actions including those to prevent recurrence have been identified below.

Corrective Steps that Will be Taken

Actions to be taken include:

- Develop and implement a formal survey review tool required to be completed for approving surveys. Completed reviews should be attached to surveys for periodic quality reviews.
- Revise Corrective Action program procedures, instructions, and related guidance to preclude use of human error or culpability for root, apparent, and contributing causes and analytical products.
- Develop a job familiarization guide (JFG) with specific focus on management of Radiological Services outage resources.

Date of Full Compliance

Full compliance was achieved on May 29, 2021, upon approval of return-to-work criteria.