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September 10, 2024
GO2-24-082

10 CFR 50.90
10 CFR 50, Appendix E

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
REGARDING LICENSE AMENDMENT REQUEST TO REVISE
COLUMBIA EMERGENCY PLAN**

- References:
1. Letter from Energy Northwest to NRC, "License Amendment Request to Revise Columbia Generating Station Emergency Plan," dated January 30, 2024 (ADAMS Accession Number ML24030A844)
 2. Letter from NRC to Energy Northwest, "Columbia Generating Station – Supplemental Information Needed for Acceptance of Requested Licensing Action RE: License Amendment Request to Revise Emergency Plan (EPID L-2024-LLA-0011)," dated March 14, 2024 (ADAMS Accession Number ML24058A069)
 3. Letter from Energy Northwest to NRC, "Supplement to License Amendment Request to Revise Columbia Generating Station Emergency Plan," dated March 20, 2024 (ADAMS Accession Number ML24081A193)
 4. Letter from NRC to Energy Northwest, "Final Request for Additional Information – Columbia Generating Station – License Amendment Request to Revise Emergency Plan – EPID: L-2024-LLA-0011," dated August 1, 2024 (ADAMS Accession Number ML24215A367)

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Dear Sir or Madam:

By Reference 1, Energy Northwest submitted a license amendment request to revise the Columbia Generating Station Emergency Plan. In response to Reference 2, Energy Northwest submitted Reference 3 containing supplemental information to Reference 1. By Reference 4, the Nuclear Regulatory Commission requested additional information related to the Energy Northwest submittal.

The enclosure to this letter contains the information requested in Reference 4.

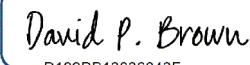
There are no regulatory commitments made in this submittal.

If you have any questions or require additional information, please contact Mr. R. M. Garcia at 509-377-8463.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 10th day of September, 2024.

Respectfully,

DocuSigned by:

D199DB13836043F...
David P. Brown
Site Vice President

Enclosure: Response to Request for Additional Information Regarding License
 Amendment Request to Revise Columbia Emergency Plan

cc: NRC RIV Regional Administrator
 NRC NRR Project Manager
 NRC Senior Resident Inspector/988C
 CD Sonoda – BPA/1399
 EFSECutc.wa.gov – EFSEC
 E Fordham – WDOH
 R Brice – WDOH
 L Albin – WDOH

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Response to Request for Additional Information Regarding License Amendment Request to Revise Columbia Emergency Plan

Background

By letter dated January 30, 2024 (Agencywide Documents Access and Management System Accession No. ML24030A844), as supplemented by letter dated March 20, 2024 (ML24081A193), Energy Northwest requested changes to the Columbia Generating Station (Columbia or CGS) Emergency Plans for U.S. Nuclear Regulatory Commission (Commission, NRC) review and prior approval pursuant to Section 50.54(q) of Title 10 of the *Code of Federal Regulations* (10 CFR). Specifically, the proposed changes to the Columbia Emergency Plan were developed utilizing the guidance in NUREG-0654/FEMA REP-1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," Revision 2, dated December 2019 (ML19347D139).

To complete the review of Energy Northwest's license amendment request (LAR), the NRC staff requested the following additional information. Energy Northwest's responses to the requests for additional information (RAI) are provided below.

RAI 1

Requirement:

- 10 CFR 50.47(b)(2) requires on-shift facility licensee responsibilities for emergency response are unambiguously defined, adequate staffing to provide initial facility accident response in key functional areas is maintained at all times, timely augmentation of response capabilities is available and the interfaces among various onsite response activities and offsite support and response activities are specified.
- The licensee has adopted NUREG-0654 Rev. 2. Associated guidance in NUREG-0654, Section II.B, Evaluation Criterion B.1 states that the emergency plan specifies how the requirements of 10 CFR 50.47(b)(2) and the applicable sections of Appendix E to 10 CFR Part 50 are met.

Issue:

In the original submittal dated January 30, 2024, Section 3.1.4, "[*Deviation 1-4*] *On-Shift Chemistry Technician Position Removed*," of Enclosure 1, "*Evaluation of Proposed Changes*," states,

The current Emergency Plan assigns one on-shift Chemistry Technician to a Nuclear Chemistry function based on compliance with NUREG-0654/FEMA-REP-1, Revision 1. The proposed Emergency Plan does not use the Chemistry Technician to perform ERO tasks or functions. This change aligns the proposed

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Emergency Plan with the NUREG-0654/FEMA-REP-1, Revision 2, staffing plan guidance.

However, Section O.1.8, "*Repair and Damage Control Team Personnel*," Enclosure 2, "*Columbia Generating Station Emergency Plan*," states:

Operations, maintenance, **chemistry** and radiation protection personnel who would be assigned to repair and damage control teams receive required emergency plan training as part of their normal job-specific training program. [Emphasis added for Clarity]

Section 3.1.4 of Enclosure 1 is contrary to Section O.1.8 of Enclosure 2 and there is no discussion of how the current functions being performed by the Chemistry Technician are still be accomplished by the proposed ERO.

Request:

Please address this discrepancy between the sections and provide technical justification for the removal of the on-shift and augmenting Chemistry Technicians from the proposed Table B-1, "*On-Shift and Augmenting ERO Staffing Plan*." Specifically what emergency plan functions do the on-shift and augmenting Chemistry Technicians currently perform and how are these functions performed in the proposed emergency plan?

Energy Northwest Response to RAI 1:

Part 1 – Discrepancy

In Energy Northwest's LAR to revise the Columbia Generating Station (Columbia) Emergency Plan (Reference 1), Enclosure 1, Section 3.1.4 documents Deviation 1-4, "*On-Shift Chemistry Technician Position Removed*," which is specific to the on-shift Chemistry technician.

Enclosure 2, Section O.1.8, "*Repair and Damage Control Team Personnel*," of Reference 1 applies to both on-shift and augmenting response personnel.

Although Chemistry technicians are no longer included as members of the Emergency Response Organization (ERO), they may be called in to support response activities that are controlled and dispatched as Operations Support Center (OSC) teams. Element O.1.8 of the proposed Columbia Emergency Plan states that members of the OSC repair and damage control teams, which may include Chemistry personnel, will be provided OSC team-related training. This does not create a disparity between Table B-1, "*On-Shift and Augmenting ERO Staffing Plan*," and Element O.1.8.

Columbia's Emergency Plan content and detail in Table B-1 and Element O.1 are consistent with recent NRC-approved Duke Energy and South Texas Project Electric Generating Station Emergency Plan submittals.

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Part 2 – Justification for Removal of Chemistry Technician from Table B-1

1. On-Shift

Section 2.2, “*Shift Organization*,” of Columbia’s current Emergency Plan (Revision 68) documents the on-shift Chemistry technician as part of the normal operational shift complement. No specific emergency response functions or responsibilities are assigned to the on-shift Chemistry technician in this section.

Section 2.3, “*Emergency Response Organization*,” of the current Emergency Plan documents the on-shift Chemistry technician as part of the on-shift ERO. No specific emergency response functions or responsibilities are assigned to the on-shift Chemistry technician in this section.

Section 2.3.1.k, “*Health Physics, Chemistry, and Maintenance Support*,” of the current Emergency Plan documents Chemistry support personnel as responsible for providing chemistry analyses. This section also states that the on-shift Chemistry technician may have collateral duties at the initial stages of the emergency that consist of responding as Fire Brigade members to a fire emergency.

Table 2-1, “*Energy Northwest Emergency Response Organization Minimum Staffing Requirements*,” of the current Emergency Plan documents an on-shift Chemistry technician that performs the chemistry task for the Radiological Assessment functional area. Additionally, the Chemistry technician is assigned Fire Brigade responsibilities as collateral duty.

The basis for Energy Northwest maintaining an on-shift Chemistry technician was conformance to the NRC’s guidance in NUREG-0654/FEMA-REP-1, “*Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants*,” Revision 1, which included the major task of Chemistry/Radiochemistry under the Radiological Accident Assessment and Support of Operational Accident Assessment function. Revision 2 of this guidance document no longer requires utilities to include the Chemistry/Radiochemistry task in support of the assessment function as part of their ERO response activities. Additionally, NUREG-0654/REMA-REP-1, Revision 2, states that the number of Fire Brigade staff on-shift is controlled by the site-specific Technical Specifications and other licensing documents. Thus, documentation of Fire Brigade assignment to the firefighting function within the Emergency Plan is no longer required.

Energy Northwest believes that removal of the on-shift Chemistry technician is justified, in that the proposed Columbia Emergency Plan does not contain Emergency Plan-related response tasks or functions for an on-shift Chemistry technician. Two of the three tasks assigned to the Chemistry technician have been eliminated, as the function is no longer needed. The remaining task is performed

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by the Shift Technical Advisor/Incident Advisor. Those three tasks and their disposition in the proposed Emergency plan are shown below.

Assigned Task	Disposition	PS Category/Change Justification
OSC0000022: Perform sampling and analysis tasks	Task eliminated	<i>Accident Assessment</i> Chemistry sampling no longer an EP function
ERG0000002: Respond as directed when notified of a declared event	N/A when position is eliminated	<i>Onsite Emergency Organization</i> Position-specific action
ERX0000002: Activate ERDS	Performed by other position	<i>Communications</i> Task performed by STA/Incident Advisor

NUREG-0654/REMA-REP-1, Revision 2, does not list a Chemistry/Radiochemistry task/function, or require an on-shift Chemistry technician, nor is there a site-specific reason to maintain an on-shift Chemistry technician as part of the Emergency Plan. Energy Northwest may continue to utilize an on-shift Chemistry technician for support of plant sampling activities or for Fire Brigade; however, such staffing is not within the scope of the proposed Emergency Plan.

2. Augmenting

Table 2-2, “*Energy Northwest Emergency Response Organization Positions*,” of Columbia’s current Emergency Plan documents a 90-minute Chemistry technician ERO position assigned to the nuclear chemistry group (no listed functions or tasks).

Figure 2-1, “*Energy Northwest Emergency Response Organization Chart*,” of the current Emergency plan illustrates Chemistry support personnel as being assigned under the OSC Manager as an essential (minimum staff) ERO position.

Energy Northwest believes that removal of the augmenting Chemistry technician is justified, in that the proposed Columbia Emergency Plan does not contain Emergency Plan-related response tasks or functions for an augmenting Chemistry technician. Nor does NUREG-0654/REMA-REP-1, Revision 2, list a Chemistry/Radiochemistry task/function, or require an augmenting Chemistry technician, nor is there a site-specific reason to maintain an augmenting Chemistry technician as part of the Emergency Plan. In accordance with the proposed Emergency Plan, Energy Northwest will continue to provide OSC team training to Operations and craft personnel not identified as augmenting ERO as part of their respective departmental training, similar to craft personnel who are identified as augmenting ERO staff.

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RAI 2

Requirement:

- 10 CFR 50.47(b)(2) requires on-shift facility licensee responsibilities for emergency response are unambiguously defined, adequate staffing to provide initial facility accident response in key functional areas is maintained at all times, timely augmentation of response capabilities is available and the interfaces among various onsite response activities and offsite support and response activities are specified.
- The licensee has adopted NUREG-0654 Rev. 2. Associated guidance in NUREG-0654, Section II.B, Evaluation Criterion B.1 states that the emergency plan specifies how the requirements of 10 CFR 50.47(b)(2) and the applicable sections of Appendix E to 10 CFR Part 50 are met.

Issue:

In the original submittal dated January 30, 2024, Section 3.1.6, “[*Deviation 1-6*] *Minimum Staff Technical and Operations Manager Positions Removed*,” of Enclosure 1, “*Evaluation of Proposed Changes*,” states,

NUREG-0654/FEMA-REP-1, Revision 2 does not assign minimum staff Operations or Technical Manager ERO positions to the Engineering function.

The current Emergency Plan assigns minimum staff Operations Manager and Technical Manager ERO positions at the Alert emergency classification level to the Engineering function. The proposed Emergency Plan retains a non-minimum staff Operations Manager ERO Position and eliminates the Technical Manager ERO position.

The Technical Manager ERO position, having an Engineering background, was responsible for analysis of plant data and the development of plans and procedures in direct support of Operations personnel. This position supervised the analysis of plant safety parameters by the plant technical and Operations staff. There is no site-specific basis that requires the Technical Manager as a minimum staff ERO position.

With the elimination of the Technical Manager ERO position, there is no technical justification on how the currently assigned position’s functions are being continued by the proposed ERO changes.

Request:

Provide technical justification for the removal of the augmenting Technical Manager position from the proposed Table B-1, “*On-Shift and Augmenting ERO Staffing Plan*.” Specifically what emergency plan functions does the Technical Manager currently perform and how are these functions performed in the proposed emergency plan?

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Energy Northwest Response to RAI 2:

Section 2.3.2.d, “*TSC Technical Manager*,” of Columbia’s current Emergency Plan (Revision 68) states that the Technical Manager is responsible for analysis of plant data and the development of plans and procedures in direct support of plant operations personnel. This position supervises the analysis of plant safety parameters by the plant technical and Operations staff.

In the proposed Emergency Plan, the Technical Support Center (TSC) Manager is the ERO position responsible for supervising the Engineering and Operations staff in the analysis of plant parameters and event indications for accident detection and assessment activities. The TSC Manager ERO position will no longer be used to take interim command and control as the Emergency Director, allowing the focus to remain primarily on response activities inside the protected area.

Specifically, the Technical Manager is assigned seven tasks within the Emergency Plan Implementing Procedures. Three of the seven tasks are performed by other ERO positions. Three of the tasks were administrative in nature, and applicable to ERO positions in general. One task has been re-assigned to another ERO position. Those seven tasks and their disposition in the proposed Emergency Plan are shown below.

Assigned Task	Disposition	PS Category/Change Justification
ERX0000008: Coordinate outside Engineering support	Re-assigned	<i>Response Support & Resources</i> Re-assigned to TSC Manager and TSC Engineers
ERX0000034: Provide Engineering support for accident detection and assessment	Performed by other position	<i>Accident Assessment</i> Task performed by TSC Engineers
ERX0000062: Provide input for facility briefs and updates	N/A when position is eliminated	<i>Response Administration</i> Position-specific action
TSC0000003: Manage the activities of the TSC Engineering/Technical staff	Performed by other position	<i>Organization Control</i> Task performed by TSC Manager as part of Task #TSC0000001
ERX0000007: Arrange for logistics support	Performed by other position	<i>Response Support & Resources</i> Task performed by Mechanical Engineer
ERG0000002: Respond as directed when notified of a declared event	N/A when position is eliminated	<i>Onsite Emergency Organization</i> Position-specific action
ERG0000007: Apply human performance error reduction techniques in the performance of your ERO duties	N/A when position is eliminated	<i>Response Administration</i> Position-specific action

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RAI 3

Requirement:

- 10 CFR 50.47(b)(2) requires on-shift facility licensee responsibilities for emergency response are unambiguously defined, adequate staffing to provide initial facility accident response in key functional areas is maintained at all times, timely augmentation of response capabilities is available and the interfaces among various onsite response activities and offsite support and response activities are specified.
- The licensee has adopted NUREG-0654 Rev. 2. Associated guidance in NUREG-0654, Section II.B, Evaluation Criterion B.1 states that the emergency plan specifies how the requirements of 10 CFR 50.47(b)(2) and the applicable sections of Appendix E to 10 CFR Part 50 are met.

Issue:

In the original submittal dated January 30, 2024, Section 3.2.7, “[*Deviation 2-7*] *Radiation Protection Personnel at 90 Minutes*,” of Enclosure 1 states,

The proposed Emergency Plan specifies a 90-minute response time for the **five** minimum staff HP Technicians that perform the Radiation Protection function.
[Emphasis added for Clarity]

Further, Attachment 1, “*Emergency Response Organization Staffing Plan Comparison Table*” in Enclosure 1 states that the “*Current E-Plan, Rev 68*” staffing for Health Physics includes,

5 HP Technicians available in 90 minutes of Alert [Emphasis added for Clarity]

Additionally, the summary of changes in Revision 68 of the Columbia Emergency Plan (ML23039A208) states in part,

Added HP Lead to Table 2-2 (which aligns with E-Plan Section 2.3.2.j) and adjusted the number for the HP Tech (Protective Actions) to 3 which had previously included the HP Lead, as this clarifies that the HP Lead was credited as one of the listed HP Techs (Protective Actions) in Table 2.2.

However, Table 2.2, “Energy Northwest Emergency Response Organization Essential Positions,” in Revision 63 of the Columbia Emergency Plan (ML16208A5970) staffing for Health Physics includes,

6 HP Technicians available in 90 Minutes [Emphasis added for Clarity]

It is not clear to the NRC staff that the HP Lead meets the same level of qualification and training to perform the Protective Actions function as the HP Techs.

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Request:

Provide additional information to demonstrate that the HP Lead has the same level of qualification and training to perform the Protective Actions function as the HP Technicians.

Energy Northwest Response to RAI 3:

The Health Physics (HP) Lead ERO position is provided identical Emergency Preparedness-related training as that received by an HP technician assigned to the on-shift ERO, or as an OSC HP technician responder. All individuals filling the HP Lead position have current or prior American National Standards Institute (ANSI) Radiation (RP) technician qualification. ANSI RP technician qualification is currently required for the HP technicians. Prior ANSI RP technician qualification will be a prerequisite requirement for the HP Leads.

Note that Energy Northwest provides three on-shift HP technicians, which is above the two suggested in the NUREG-0654/FEMA-REP-1 guidance. Thus, the total number of eight HP technicians filling both on-shift and augmenting ERO positions for the RP function in the proposed Emergency Plan is equivalent to NRC guidance.

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RAI 4

Requirement:

- 10 CFR 50.47(b)(2) requires on-shift facility licensee responsibilities for emergency response are unambiguously defined, adequate staffing to provide initial facility accident response in key functional areas is maintained at all times, timely augmentation of response capabilities is available and the interfaces among various onsite response activities and offsite support and response activities are specified.
- The licensee has adopted NUREG-0654 Rev. 2. Associated guidance in NUREG-0654, Section II.B, Evaluation Criterion B.1 states that the emergency plan specifies how the requirements of 10 CFR 50.47(b)(2) and the applicable sections of Appendix E to 10 CFR Part 50 are met.

Issue:

In the original submittal dated January 30, 2024, Section 3.2.11, “[*Deviation 2-11*] *Operations Support Center Craft at 90 minutes*,” of Enclosure 1 states,

The NRC Safety Evaluation dated August 5, 2004 (ML042440479), found this 90-minute response time acceptable based on adequate resource availability, the cross-training of on-shift Equipment Operators (EO) in mechanical, electrical, and I&C [instrument and control] maintenance activities, and inclusion of all four on-shift EOs to support essential repair and corrective actions within 90 minutes of event classification, prior to staff augmentation.

Request:

Provide clarification that the basis for the 2004 approval is currently valid for the cross-training of the on-shift EOs. In your clarification, provide technical justification for any deviations.

Energy Northwest Response to RAI 4:

The Emergency Plan Implementing Procedure for the ERO training program related to the proposed Emergency Plan states the following:

Equipment Operators are typically used to fulfill on-shift staffing requirements for the Repair Team Activities function. This function may involve minor mechanical, electrical, or instrumentation and control (I&C) actions, such as tightening the packing on a valve, racking in a breaker, venting a gauge, and reading blueprints or drawings. Equipment Operators assigned this function receive basic maintenance training in accordance with the Equipment Operator Qualification Directory by the Training Department as part of their Operator Training program.

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Equipment Operators continue to receive training in generic engineering fundamentals, systems training, and the following training related to basic maintenance:

Heise Gauge Installation, Test Equipment & Tools, Bearings & Lubrication, Electrical Breakers 480 Volt, Electrical Breakers 4160/6900 Volt, Limitorque Valves, Electrical Determination/Termination, Mechanical Blueprints, Electrical Blueprints, and Electrical Wiring Diagrams.

A comparison of the training requirements from the 2004 timeframe associated with the referenced NRC Safety Evaluation (ML042440479), and the requirements from the current Equipment Operator Qualification Directory shows that the Equipment Operators receive the same cross-training based on the requirements of Columbia's Final Safety Analysis Report, and that the basis for the 2004 approval remains valid for the cross-training of the on-shift Equipment Operators.

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RAI 5

Requirement:

- 10 CFR 50.47(b)(10) requires a range of protective actions has been developed for the plume exposure pathway EPZ [emergency planning zone] for emergency workers and the public....
- Section IV.6 of Appendix E to 10 CFR Part 50 states in part, that if at any time during the decennial period, the EPZ permanent resident population increases such that it causes the longest ETE [evacuation time estimate] value for the 2-mile zone or 5-mile zone, including all affected Emergency Response Planning Areas, or for the entire 10-mile EPZ to increase by 25 percent or 30 minutes, whichever is less, from the nuclear power reactor licensee's currently NRC approved or updated ETE, the licensee shall update the ETE analysis to reflect the impact of that population increase.
- Associated guidance in NUREG-0654, Section II.J, Evaluation Criterion J.8.a states that [The latest ETEs are] incorporated either by reference or in their entirety into the emergency plan.

Issue:

In the original submittal, dated January 30, 2024, (pages 56 & 57 of 98) Section J.8.a of Enclosure 2 states in part,

The ETE report will be updated: ...

B. If at any time during the decennial period, the EPZ permanent resident population increases such that it causes the longest ETE value for;

- the 2-mile zone (Section CGS)

OR

- the entire 10-mile EPZ (Sections 1 – 4 collectively)

to increase by 25 percent or 30 minutes, whichever is less, from the currently NRC approved or updated ETE.

However, Section M.3, "*Effect of Changes in Permanent Resident Population*," of the "*Columbia Generating Station Development of Evacuation Time Estimates*," dated July 27, 2022 (ML22242A210), states,

Section IV of Appendix E to 10 CFR Part 50, and NUREG/CR-7002, Rev. 1, Section 5.4, require licensees to provide an updated ETE analysis to the NRC when a population increase within the EPZ causes the longest 90th percentile ETE

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values (for the 2-Mile Region, 5-Mile Region or entire EPZ) to increase by 25% or 30 minutes, whichever is less.

Request:

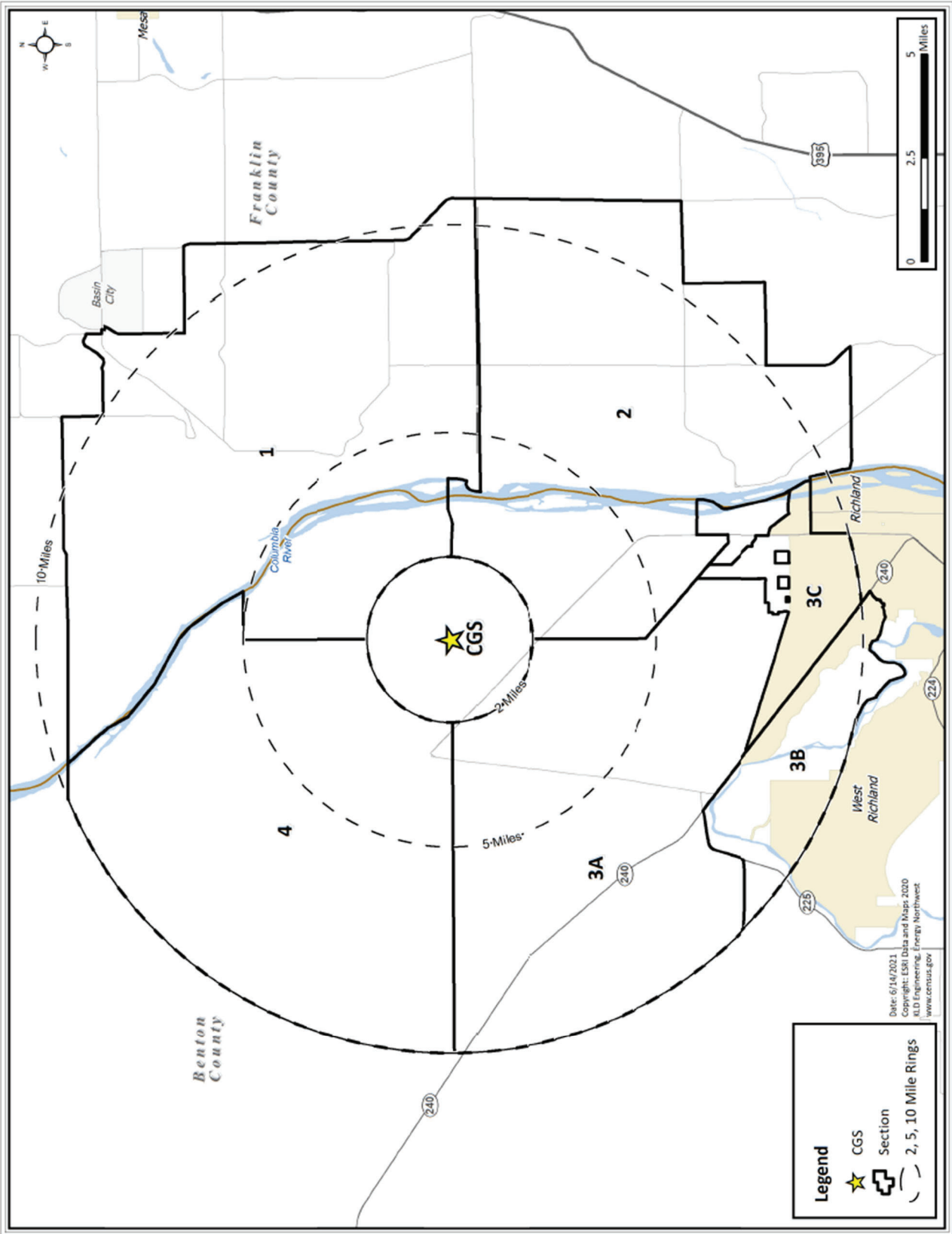
Provide technical justification for why Energy Northwest did not include the 5-Mile Region as a criteria to update the ETE report.

Energy Northwest Response to RAI 5:

Columbia is located on the Department of Energy (DOE) site in Richland, WA, and has an extremely low resident population throughout the Emergency Planning Zone (EPZ). There are no permanent residents in the 0 to 4 mile ring. The 2024 Population Update Analysis identified 85 permanent residents in the 4 to 5 mile ring east of the site in Sections 1 and 2. In 1983 when the NRC approved the initial Emergency Plan for Columbia, the resident population in the 4 to 5 mile ring was 80 persons, which represents a change of approximately 6% of total resident population in those two sections over the past four decades.

Due to the low population and geographical area surrounding Columbia, the Protective Action Recommendation (PAR) scheme does not include actions for a 5-mile distance. The following figure shows Sections 1 through 4, which cover the full area between 2 to 10 miles. The bases provide for an initial PAR of 2-mile radius and 10 miles downwind upon entry into a General Emergency classification. The offsite PARs, dated July 17, 2014, were developed in conjunction with, and approved by, representatives from utility, state, county, the DOE, and the Federal Emergency Management Agency.

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RAI 6

Requirement:

- 10 CFR 50.47(b)(15) requires radiological emergency response training is provided to those who may be called on to assist in an emergency.
- The licensee has adopted NUREG-0654 Rev. 2. Associated guidance in NUREG-0654, Section II.O, Evaluation Criterion O.1 states in part that initial training and at least annual retraining are provided.

Issue:

In the original submittal dated January 30, 2024, Section 3.7.5, “[*Deviation 7-5*] *Response Personnel Retraining Periodicity Not Specified*,” of Enclosure 1 states in part,

...the ERO training program is developed and evaluated based on position-specific responsibilities/tasks using SAT [systematic approach to training] principles, when applicable. The SAT process determines the necessary periodicity of retraining (continuing retraining) on a task basis.

However, the statement that the SAT process determines the necessary periodicity of retraining does not discuss how the training program meets the guidance of NUREG-0654 Rev. 2.

Request:

Clarify how the SAT frequency compares to and meets the intent of the “annual retraining” guidance of NUREG-0654, Revision 2.

Energy Northwest Response to RAI 6:

Section O.2 of the proposed Emergency Plan will be revised to read,

The ERO training program is developed based on position-specific responsibilities/tasks using SAT principles. Lesson plans and position-specific guides are developed based on task assignments. Requalification training consists of ERO refresher training and/or drill participation for designated positions at least annually.

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RAI 7

Requirement:

- 10 CFR 50.47(b)(15) requires radiological emergency response training is provided to those who may be called on to assist in an emergency.
- The licensee has adopted NUREG-0654 Rev. 2. Associated guidance in NUREG-0654, Section II.O, Evaluation Criterion O.2.a states that the ERO training program is reviewed at least annually and revised as necessary.

Issue:

In the original submittal dated January 30, 2024, Section 3.7.6, “[*Deviation 7-6*] Training Program Review Periodicity Not Specified,” of Enclosure 1 states in part,

In addition to continuous training evaluation through drills and exercise critique process that identifies performance issues and initiates training reviews for particular tasks, the SAT process includes provisions for training program reviews.

However, similar to RAI6, there is no technical justification for not providing a periodicity in the training program.

Request:

Clarify how the SAT frequency compares to and meets the intent of the “at least annually” guidance of NUREG-0654, Revision 2.

Energy Northwest Response to RAI 7:

Section O.2.a of the proposed Emergency Plan will be revised to read,

The ERO training program is reviewed at least annually. Revisions to the training program are identified during EP assessments, drill and exercise critiques, and from training feedback. Appropriate revisions to the training program are made using the principles of the SAT process.