



David P. Brown
Columbia Generating Station
P.O. Box 968, PE23
Richland, WA 99352-0968
509.377.8385
dpbrown@energy-northwest.com

September 24, 2024

GO2-24-088

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
SUPPLEMENT TO 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)
 5. Letter from Energy Northwest to NRC, "Response to Request for Additional Information Regarding License Amendment Request to Revise Columbia Emergency Plan," dated September 10, 2024 (ADAMS Accession Number ML24254A366)

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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. In response to Reference 4, Energy Northwest submitted Reference 5 containing responses to the requested additional information.

The enclosure to this letter contains supplemental information to Reference 5, specific to Item 5.

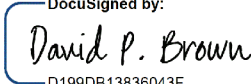
There are no regulatory commitments made in this submittal.

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 24th day of September, 2024.

Respectfully,

DocuSigned by:

D199DB13836043F...
David P. Brown
Site Vice President

Enclosure: Supplement to 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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Supplement to 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 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.

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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 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:

Section J.8.a of the proposed Emergency Plan will be revised to read,

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 region (Section CGS)

OR

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- the 5-mile region (Sections 1, 2, 3A, and 4)

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.