



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION IV
1600 EAST LAMAR BOULEVARD
ARLINGTON, TEXAS 76011-4511

September 16, 2025

Robert Schuetz, Chief Executive Officer
Energy Northwest
76 North Power Plant Loop
P.O. Box 968 (Mail Drop 1023)
Richland, WA 99352

**SUBJECT: COLUMBIA GENERATING STATION—SECURITY BASELINE INSPECTION
REPORT 05000397/2025402**

Dear Robert Schuetz:

On August 21, 2025, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at Columbia Generating Station and discussed the results of this inspection with Dawn Sileo, Executive Vice President and Chief Nuclear Officer, and other members of your staff. The results of this inspection are documented in the enclosed report.

One finding of very low security significance (Green) is documented in this report. This finding involved a violation of NRC requirements. We are treating this violation as a non-cited violation (NCV) consistent with Section 2.3.2 of the Enforcement Policy.

If you contest the violation or the significance or severity of the violation documented in this inspection report, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001; with copies to the Regional Administrator, Region IV; the Director, Office of Enforcement; the Director, Office of Nuclear Security and Incident Response; and the NRC Resident Inspector at Columbia Generating Station.

The following cross cutting aspect was assigned to a finding using Inspection Manual Chapter 0310 "Aspects Within Cross Cutting Areas:" [H.11] - Challenge the Unknown.

If you disagree with a cross-cutting aspect assignment in this report, you should provide a response within 30 days of the date of this inspection report, with the basis for your disagreement, to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001; with copies to the Regional Administrator, Region IV; the Director, Office of Nuclear Security and Incident Response; and the NRC Resident Inspector at Columbia Generating Station.

This letter, its enclosure, and your response (if any) will be made available for public inspection and copying at <http://www.nrc.gov/reading-rm/adams.html> and at the NRC Public Document Room in accordance with Title 10 of the *Code of Federal Regulations* 2.390, "Public Inspections, Exemptions, Requests for Withholding."

Sincerely,



Signed by Rollins, Jesse
on 09/16/25

Jesse M. Rollins, Chief
Physical Security Branch
Division of Radiological Safety & Security

Docket No. 05000397
License No. NPF-21

Enclosure:
As stated

cc w/ encl: Distribution via LISTSERV

COLUMBIA GENERATING STATION — SECURITY BASELINE INSPECTION REPORT
05000397/2025402 – DATED SEPTEMBER 16, 2025

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DOCUMENT NAME: COLUMBIA GENERATING STATION—SECURITY BASELINE
INSPECTION REPORT 05000397/2025402
ADAMS ACCESSION NUMBER: **ML25258A246**

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U.S. NUCLEAR REGULATORY COMMISSION
Inspection Report

Docket Number: 05000397

License Number: NPF-21

Report Number: 05000397/2025402

Enterprise Identifier: I-2025-402-0011

Licensee: Energy Northwest

Facility: Columbia Generating Station

Location: Richland, Washington

Inspection Dates: August 18, 2025, to August 21, 2025

Inspectors: D. Holman, Sr Physical Security Inspector

Approved By: Jesse M. Rollins, Chief
Physical Security Branch
Division of Radiological Safety & Security

Enclosure

SUMMARY

The U.S. Nuclear Regulatory Commission (NRC) continued monitoring the licensee's performance by conducting a security baseline inspection at Columbia Generating Station, in accordance with the Reactor Oversight Process. The Reactor Oversight Process is the NRC's program for overseeing the safe operation of commercial nuclear power reactors. Refer to <https://www.nrc.gov/reactors/operating/oversight.html> for more information.

List of Findings and Violations

Failure to Take Immediate Action to Prevent an Individual Whose Fitness Was Questionable from Performing Duties That Required Them to be Subject to Part 26.			
Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Security	Green NCV 05000397/2025402-01 Open/Closed	[H.11] - Challenge the Unknown	71130.02
The inspector identified a Green finding and associated non-cited violation (NCV) of Title 10 of the <i>Code of Federal Regulations</i> (10 CFR) 26.77(b) for the failure to prevent an individual from performing duties that require him or her to be subject to 10 CFR Part 26 after the individual appeared to be impaired or the individual had questionable fitness. Specifically, the licensee observed an individual whose fitness was questionable but failed to take immediate action to suspend the individual's unescorted access to the protected area.			

Additional Tracking Items

None.

INSPECTION SCOPES

Inspections were conducted using the appropriate portions of the inspection procedures (IPs) in effect at the beginning of the inspection unless otherwise noted. Currently approved IPs with their attached revision histories are located on the public website at <http://www.nrc.gov/reading-rm/doc-collections/insp-manual/inspection-procedure/index.html>. Samples were declared complete when the IP requirements most appropriate to the inspection activity were met consistent with Inspection Manual Chapter (IMC) 2201, "Security Inspection Program for Commercial Nuclear Power Reactors." The inspector reviewed selected procedures and records, observed activities, and interviewed personnel to assess licensee performance and compliance with Commission rules and regulations, license conditions, site procedures, and standards.

SAFEGUARDS

71130.02 - Access Control

The inspector evaluated the access control program through completion of the following inspection elements:

Access Control (1 Sample)

- (1) Tier I: 13 Requirements (02.01 a–c,e; 02.02 c–f; 02.03 a; 02.04 a,b,e; 02.05 a)
Tier II: 5 Requirements (02.06 a,c; 02.08 a,b,i)
Tier III: 1 Requirement (02.09)

71130.09 - Security Plan Changes

The inspector evaluated the security plan changes through completion of the following inspection procedure elements:

Security Plan Changes (1 Sample)

- (1) Since the last NRC baseline inspection of this program area, Security Plan Revision 21 to 22 was implemented. Based on the Columbia Generating Station evaluation, and in accordance with 10 CFR 50.54(p)(2), the changes resulted in no decrease in safeguards effectiveness of the security plan and the revised security plan changes continue to meet the requirements of 10 CFR 72.212(b) and 10 CFR 73.55(b). The inspector conducted walk-downs and a review of the security plan changes to evaluate for a potential decrease in safeguards effectiveness of the security plan; however, this review does not constitute formal NRC approval of those changes. Therefore, the changes remain subject to future NRC inspection in their entirety.

71151 - Performance Indicator Verification

The inspector verified licensee performance indicators submittals listed below:

PP01: Protected Area Security Equipment Performance Index Sample (IP Section 02.17)
(1 Sample)

(1) January 1, 2025, through July 31, 2025.

INSPECTION RESULTS

Failure to Take Immediate Action to Prevent an Individual Whose Fitness Was Questionable from Performing Duties that Required them to be Subject to Part 26			
Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Security	Green NCV 05000397/2025402-01 Open/Closed	[H.11] - Challenge the Unknown	71130.02
The inspector identified a Green NCV of 10 CFR 26.77(b) for failing to prevent an individual from performing the duties that require him or her to be subject to Part 26 after the individual appeared to be impaired or the individual had questionable fitness. Specifically, the licensee observed an individual whose fitness was questionable but failed to take immediate action to suspend the individual's unescorted access to the protected area. <u>Description:</u> While reviewing a document in an individual's access authorization file, "Subject: Adjudication of Unescorted Access Authorization (UAA)," dated December 21, 2023, the inspector found six memorandums from two fitness for duty (FFD) alcohol and urine sample collectors and one department leader documenting concerns about an individual donor's physical appearance during drug and alcohol testing from October 12, 2023, to November 13, 2023. Specifically, the collectors and department leader observed aberrant physical characteristics indicating a possible medical issue that could be a safety or security concern. A determination of fitness (DOF) was eventually conducted on November 30, 2023. The inspector reviewed the individual's protected area (PA) badge access records from October 12, 2023, to December 5, 2023, and noted that the individual retained their unescorted access to the licensee's PA throughout this time period and entered the PA two times on November 14, 2023. Based on this information, the inspector concluded that the two FFD specimen collectors and the department leader had witnessed indications of possible impairment while interacting with the individual during required collections but failed to take appropriate action. Specifically, the collectors and the department leader failed to prevent the individual from performing their duties inside the protected area until the questionable conditions were resolved through a DOF that indicated that the individual was fit to safely and competently perform his or her duties. Corrective Actions: For immediate corrective actions, the licensee briefed all members of the FFD collection staff on proper actions for such situations and entered the issue into its corrective action program. Corrective Action References: Action Request 00461802			
<u>Performance Assessment:</u>			

Performance Deficiency: The failure to take immediate action to prevent an individual that appeared to be impaired or to have questionable fitness from performing the duties that require him or her to be subject to 10 CFR Part 26 is a performance deficiency. It is a performance deficiency because the licensee failed to meet a requirement that was within its ability to foresee and correct and should have been prevented.

Screening: The inspector determined the performance deficiency was more than minor because it was associated with the access authorization attribute of the security cornerstone and adversely affected the cornerstone objective to provide assurance that the licensee's security system and material control and accountability program use a defense-in-depth approach and can protect against (1) the design basis threat of radiological sabotage from external and internal threats, and (2) the theft or loss of radiological materials. It adversely affected the cornerstone objective because the failure to ensure individuals who have unescorted access to protected and vital areas are fit for duty could result in a failure to mitigate an insider threat.

Significance: The inspector assessed the significance of the finding using IMC 0609 Appendix E, Part I, "Baseline Security SDP for Power Reactors." The inspector determined that the cumulative total for the finding is zero (0) points. Because the calculated point total did not exceed the range for a Green determination (0 to 6 points), the inspector determined the finding to be of very low security significance.

Cross-Cutting Aspect: H.11 - Challenge the Unknown: Individuals stop when faced with uncertain conditions. Risks are evaluated and managed before proceeding. The trained collectors knew the donor was passing required drug and alcohol tests but also demonstrated unusual behavior and appearance. Despite this, the collectors allowed the situation to continue unanalyzed and without taking immediate action.

Enforcement:

Violation: Title 10 CFR 26.77(b), states, in part, "If an individual appears to be impaired or the individual's fitness is questionable, the licensee shall take immediate action to prevent the individual from performing the duties that require him or her to be subject to this subpart."

Energy Northwest Procedure SWP-FFD-01, "Fitness for Duty Program Requirements," revision 23, Section 3.5.3 d., states, "For other indications of possible impairment that do not create a reasonable suspicion of substance abuse (or fatigue), Energy Northwest may permit the individual to return to performing his or her duties only after the impairing or questionable conditions are resolved and a determination of fitness indicated that the individual is fit to safely and competently perform his or her duties."

Contrary to the above, from October 12, 2023, to December 4, 2023, the licensee permitted an individual exhibiting indications of possible impairment that did not create a reasonable suspicion of substance abuse (or fatigue) to return to performing his or her duties before the impairing or questionable conditions were resolved and a determination of fitness indicated that the individual was fit to safely and competently perform his or her duties. Specifically, FFD specimen collectors and a department leader observed indications of possible impairment but failed to take immediate action to suspend the individual's unescorted access to the protected area. This resulted in the individual gaining unescorted access to the protected area two times before the substance abuse expert completed a determination of fitness on the individual on November 30, 2023.

Enforcement Action: This violation is being treated as a non-cited violation, consistent with Section 2.3.2 of the Enforcement Policy.

EXIT MEETINGS AND DEBRIEFS

The inspector verified no proprietary information was retained or documented in this report.

- On August 21, 2025, the inspector presented the security baseline inspection results to Dawn Sileo, Executive Vice President and Chief Nuclear Officer, and other members of the licensee staff.

DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71130.02	Corrective Action Documents Resulting from Inspection	00474768, 00474810, 00471111, 00461802, 00461797, 00461798, 00460310, 00464837, 00461803, 00461799, 00461801, 00461800	Action Request	
71130.02	Miscellaneous	NANTel	Generic Plant Access Training	Revision 12
71130.02	Miscellaneous	RG 5.76	Physical Protection Programs at Nuclear Reactors	2020
71130.02	Procedures	SFI-21	Off Site Laundry	Revision 000
71130.02	Procedures	SPIP-SEC-05	Personnel Search Officer, Access Control/Security Communications Center Officer, Protected Area Access Point	Revision 042
71130.02	Procedures	SPIP-SEC-06	Vehicle Escort Officer, Vehicle Search Officer, and Protected Area Perimeter Gates	Revision 029
71130.02	Procedures	SPIP-SEC-10	Special Purpose Detectors, Operability Test, Inspection, and Maintenance Records	Revision 019
71130.02	Procedures	SPIP-SEC-19	Key and Lock Control	Revision 007
71130.02	Procedures	SPIP-SEC-28	Mobile Patrol	Revision 006
71130.02	Procedures	SPIP-SEC-64	Warehouse X-Ray	Revision 004
71130.02	Procedures	SWP-SEC-02	Protection of Safeguards Information	Revision 021
71130.02	Procedures	SWP-SEC-03	Security Responsibilities of Site Personnel	Revisions 031/032
71130.02	Procedures	SWP-SEC-12	Protected and Vital Area Personnel and Vehicle Access Controls	Revision 010
71130.09	Miscellaneous	PSP-01	Physical Security Plan (SAFEGUARDS)	Revision 21 and 22