

ENERGY NORTHWEST

P.O. Box 968 ■ Richland, Washington 99352-0968

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
One White Flint North
11555 Rockville Pike
Rockville, MD 20852-2738

Subject: COLUMBIA GENERATING STATION, DOCKET NO. 50-397, LICENSE NO. NPF-21; RESPONSE TO ISSUANCE OF ORDERS TO MODIFY LICENSE FOR REVISED DESIGN BASIS THREAT AND COMPENSATORY MEASURES RELATED TO SECURITY FORCE TRAINING AND FITNESS-FOR-DUTY

- References:
- 1) NRC Letters from Samuel J. Collins to Holders of Licenses for Operating Power Reactors as listed in Enclosure 2, dated April 29, 2003, Regarding Issuance of Order Requiring Compliance with Revised Design Basis Threat for Operating Power Reactors (EA-03-086)
 - 2) Issuance of Order for Compensatory Measures Related to Training Enhancements on Tactical and Firearms Proficiency and Physical Fitness Applicable to Armed Nuclear Power Plant Security Force Personnel (EA-03-039)
 - 3) Issuance of Order for Compensatory Measures Related to Fitness-For-Duty Enhancements Applicable to Nuclear Facility Security Force Personnel (EA-03-038)

Dear Sir or Madam:

In response to the events of September 11, 2001, Energy Northwest, on its own and in response to NRC Advisories, Orders and industry initiatives, promptly initiated and maintained heightened security measures to continue to provide high assurance that activities involving special nuclear material are not adverse to the common defense and security and do not constitute an unreasonable risk to the public health and safety in the current threat environment.

IF53

**RESPONSE TO ISSUANCE OF ORDERS TO MODIFY LICENSE FOR REVISED
DESIGN BASIS THREAT AND COMPENSATORY MEASURES RELATED TO
SECURITY FORCE TRAINING AND FITNESS-FOR-DUTY**

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On April 29, 2003, the NRC issued Orders requiring additional compensatory measures as prudent to address the current security threat environment. Pursuant to the requirements of 10 CFR § 50.4, the attachment to this letter contains Energy Northwest's responses to the referenced Orders. Energy Northwest fully intends to comply with the Orders.

Energy Northwest notes the request for clarification of the five DBT issues provided in the safeguards attachment to the letter from Mr. Colvin, President and CEO of the Nuclear Energy Institute, to Chairman Diaz dated May 16, 2003. Energy Northwest encourages the Commission to respond to this request as soon as possible as the Commission's clarifications may affect the manner of its compliance with the Orders.

Pursuant to the requirements of 10 CFR § 2.202(a)(2), a document containing the answers to two of the orders and a conditional answer and extension of time to request a hearing for the other, is being transmitted to the Secretary of the Commission under separate cover. In addition, Energy Northwest has sent a letter to the Director, Office of Nuclear Reactor Regulation requesting an extension of time in which to submit an Answer and request a hearing for one of the orders and for certain relief regarding the two other orders. As required by Condition III.C. of the DBT Order and Condition III.C.2 of the other two Orders, Energy Northwest will notify the Commission when full compliance with each order has been achieved.

Should you have any questions or desire additional information regarding this matter, please call Ms. CL Perino at (509) 377-2075.

Respectfully,

A handwritten signature in black ink, appearing to read 'JV Parrish', with a stylized flourish at the end.

JV Parrish
Chief Executive Officer
Mail Drop 1023

Attachments: (1) Response to Issuance of Orders to Modify License for Revised Design Basis
Threat and Compensatory Measures Related to Security Force Training and
Fitness-For-Duty
(2) Affidavit

cc: (See Next Page)

cc: w/o attachments unless indicated otherwise

Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
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U. S. Nuclear Regulatory Commission
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**RESPONSE TO ISSUANCE OF ORDERS TO MODIFY LICENSE FOR REVISED
DESIGN BASIS THREAT AND COMPENSATORY MEASURES RELATED TO
SECURITY FORCE TRAINING AND FITNESS-FOR-DUTY**

Attachment 1

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Compliance with Revised Design Basis Threat (DBT) Order

Order EA-03-086 Item III A. 1

All licensees shall, notwithstanding the provisions of any Commission regulation, license, or order to the contrary, revise their physical security plans and safeguards contingency plans, prepared pursuant to 10 C.F.R. §§50.34(c) and 50.34(d), to provide protection against the DBT set forth in Attachment 2 to the Order. In addition, all licensees shall, notwithstanding the provisions of any Commission regulation, license, or order to the contrary, revise their guard training and qualification plans, required by 10 C.F.R. § 73.55(b)(4)(ii), to implement the DBT set forth in Attachment 2 to this Order.

Energy Northwest's (EN) Response to Order EA-03-086 Item III A.1

Energy Northwest, the operator of Columbia Generating Station will, subject to the relief requested in the form of clarifications, submit to the Commission for review and approval no later than April 29, 2004, the revised physical security plans, safeguards contingency plans, and guard training and qualification plans, including an implementation schedule, which will describe how the facilities will respond to the design basis threat contained in Attachment 2 to the Order.

**RESPONSE TO ISSUANCE OF ORDERS TO MODIFY LICENSE FOR REVISED
DESIGN BASIS THREAT AND COMPENSATORY MEASURES RELATED TO
SECURITY FORCE TRAINING AND FITNESS-FOR-DUTY**

Attachment 1

Page 2 of 3

Compensatory Measures Related to Security Training Order

Order EA-03-039 Item III.A.1

All licensees shall, notwithstanding the provisions of any Commission regulation or license to the contrary, comply with the requirements described in Attachment 2 to this Order except to the extent that a more stringent requirement is set forth in the licensee's security plan and training and qualification plan.

Energy Northwest's Response to Order EA-03-039 Item III A.1

Energy Northwest is implementing, subject to the relief requested in the form of clarifications, the requirements in attachment 2 to Order EA-03-039 and shall complete implementation as set forth below:

The requirements of Item C.1.a will be complete by October 29, 2004.

Energy Northwest will be in compliance with the requirements of Item C.1.b by October 29, 2004.

Energy Northwest will be in compliance with the requirements of Item C.1.c by October 29, 2004, following completion of Item C.2.

Energy Northwest will be in compliance with the requirements of Item C.1.d by October 29, 2004, following completion of C.2, and C.4.

Energy Northwest will be in compliance with the requirements of Item C.1.e upon completion of item C.2.

The requirements of Item C.2.a.1 will be complete by October 29, 2004.

The requirements of Item C.2.a.2 will be complete by October 29, 2004.

Energy Northwest is currently in compliance with Item C.2.a.3.

The requirements of Item C.2.a.4 will be complete by October 29, 2004.

The requirements of Item C.2.a.5 will be complete by October 29, 2004.

The requirements of Item C.2.a.6 will be complete by October 29, 2004.

The requirements of Item C.2.b will be complete by October 29, 2004.

Energy Northwest will be in compliance with the requirements of Item C.3 by October 29, 2004.

The requirements of Item C.4 will be complete by October 29, 2004.

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Attachment 1

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Compensatory Measures Related to Security Fitness-For-Duty Enhancements Order

Order EA-03-038 Item III. A

All licensees shall, notwithstanding the provisions of any Commission regulation or license to the contrary, comply with the requirements described in Attachment 2 to this Order except to the extent that a more stringent requirement is set forth in the Licensee's security plans.

Energy Northwest Response to Order EA-03-038 Item III A.1

Energy Northwest will immediately start implementation of the requirements in Attachment 2 to Order EA-03-038 and, subject to the relief requested and possible request for a hearing, will be in compliance by October 29, 2003.

ATTACHMENT 2

STATE OF WASHINGTON)
COUNTY OF BENTON)

Subject: Response to Issuance of Orders to
Modify License for Revised Design
Basis Threat and Compensatory
Measures Related to Security Force
Training and Fitness-For-Duty

I, RL Webring, being duly sworn, subscribe to and say that I am the Vice President, Nuclear Generation for ENERGY NORTHWEST, the applicant herein; that I have the full authority to execute this oath; that I have reviewed the foregoing; and that to the best of my knowledge, information, and belief that the statements made in it are true.

DATE 6/3/ 2003

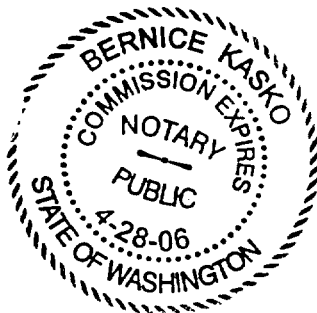



RL Webring

Vice President, Nuclear Generation

On this date personally appeared before me RL Webring, to me known to be the individual who executed the foregoing instrument, and acknowledged that he signed the same as his free act and deed for the uses and purposes herein mentioned.

GIVEN under my hand and seal this 3rd day of June 2003





Notary Public in and for the
STATE OF WASHINGTON

Residing at Benton County

My Commission expires 4/28/06