



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION IV
1600 E LAMAR BLVD
ARLINGTON, TX 76011-4511

July 14, 2015

EA-15-038

Mr. Mark E. Reddemann
Chief Executive Officer
Energy Northwest
P.O. Box 968 (Mail Drop 1023)
Richland, WA 99352-0968

**SUBJECT: FINAL SIGNIFICANCE DETERMINATION OF GREEN FINDING; COLUMBIA
GENERATING STATION - NRC EMERGENCY PREPAREDNESS INSPECTION
REPORT 05000397/2015503**

Dear Mr. Reddemann:

This letter provides you the final significance determination of the preliminary White finding discussed in Nuclear Regulatory Commission (NRC) Inspection Report 05000397/2015502 (Agencywide Documents Access and Management System (ADAMS) ML15127A534). The preliminary finding involved a failure of the emergency plan implementing procedures to implement requirements of site emergency plan. Specifically, on June 16, 2014, Columbia Generating Station staff appeared to have removed instructions in emergency plan implementing procedures for making a shelter-in-place protective action recommendation for members of the public when required, and also appeared to have removed instructions to ensure that appropriate protective actions were developed in the event of planned or intentional venting of radioactive gasses from the containment. In addition, the procedure appeared to limit the ability of the emergency director in the control room to provide protective action recommendations beyond 10 miles until the technical support center (TSC) or emergency operations facility (EOF) were capable of making initial radiological assessments to identify projected doses.

At your request, a regulatory conference was held on June 15, 2015, to discuss your views on this issue. A copy of the handout you provided is available in ADAMS (ML15163A180). During the meeting, your staff described your assessment of the finding and its significance. Specifically, your staff provided the following information:

- The Columbia Generating Station developed emergency plan implementing Procedure 13.2.2, "Determining Protective Action Recommendations," Revision 18, in consultation with cognizant offsite authorities and according to the guidance of NUREG-0654 Supplement 3, "Guidance for Protective Action Strategies," dated November 2011.

- The Columbia Generating Station emergency response organization understands Procedure 13.2.2 to provide for consideration of shelter-in-place as a protective action recommendation in accordance with the station's emergency plan. A qualified and experienced emergency director demonstrated how he would use Procedure 13.2.2 to arrive at a shelter-in-place protective action recommendation if the conditions warranted such.
- The Columbia Generating Station emergency response organization understands Procedure 13.2.2 to provide for the development of protective action recommendations for planned and puff releases of airborne radioactive material in accordance with the station's emergency plan. A qualified and experienced emergency director demonstrated how he would use Procedure 13.2.2 to arrive at protective action recommendations for planned and puff releases if the conditions warranted such.
- The Columbia Generating Station emergency response organization understands Procedure 13.2.2 to direct that protective action recommendations for areas outside of the plume exposure pathway emergency planning zone (EPZ) be developed by the TSC or EOF because such recommendations require actual environmental measurements to be accurate and to avoid unnecessary protective actions, and only the TSC or EOF can direct the collection of environmental measurements. In the rare circumstance that dose projections warranted protective action recommendations beyond the EPZ so early in an accident scenario that the emergency director function still resided in the control room (i.e., there had not been sufficient time for either the TSC or the EOF to become staffed sufficiently to assume the duties of the emergency director from the control room staff), you indicated that you believed it was appropriate to delay protective action recommendations until the TSC or EOF were staffed sufficiently to make more accurate dose assessments and protective action recommendations.

Your staff acknowledged that Procedure 13.2.2 was not clear in all respects concerning a shelter-in-place recommendation and planned or puff releases, and that you relied upon an emergency director's training and experience to effectively use Procedure 13.2.2 to make the appropriate recommendations to offsite authorities.

After considering the information developed during the inspection and the additional information Columbia Generating Station staff provided at the regulatory conference, the NRC has concluded the Columbia Generating Station emergency response organization is, in fact, capable of making a protective action recommendation of shelter-in-place when that is the most appropriate protective action, and that the organization would, in fact, be capable of developing protective action recommendations for planned and puff releases of airborne radioactive material. Therefore, the NRC has concluded that no performance deficiency exists relative to these two examples of the preliminary finding documented in Inspection Report 05000397/2015502.

However, the NRC has concluded that Procedure 13.2.2 directs the control room staff to rely on the TSC or EOF to develop protective measures for areas outside the plume exposure pathway EPZ when radiological assessment projects that protective action guides are exceeded at or beyond 10 miles, even if the emergency director function resides in the control room (as it does from the beginning of an event until the rest of the emergency response organization is ready for the emergency coordinator function to be transferred out of the control room). The failure

of emergency plan implementing procedures to authorize the emergency director in the control room to develop protective action recommendations for the public in areas outside the EPZ could delay the implementation of necessary protective measures. The NRC has concluded that this procedural restriction on the control room staff is a finding which constitutes a violation of 10 CFR 50.54(q)(2) in that it fails to implement the requirements of Columbia Generating Station Emergency Plan Section 2.1 because the procedure requires the emergency director in the control room to delegate the formulation of protective action recommendations to the TSC or EOF. However, the Columbia Generating Station emergency plan states that making protective action recommendations is a non-delegable responsibility of the emergency director. This finding is appropriately characterized as Green, with very low safety significance. The associated violation is being treated as a non-cited violation, consistent with Section 2.3.2.a of the Enforcement Policy. The circumstances surrounding the violation were described in detail in NRC Inspection Report 05000397/2015502. This finding has not been assigned a cross-cutting aspect because it does not reflect current performance.

You have 30 calendar days from the date of this letter to appeal the staff's determination of significance for the identified Green finding. Such appeals will be considered to have merit only if they meet the criteria stated in the Prerequisites and Limitations sections of Attachment 2, "Process for Appealing NRC Characterization of Inspection Findings (SDP Appeal Process)," of NRC Inspection Manual Chapter 0609. An appeal must be sent in writing to the Regional Administrator, Region IV, 1600 E. Lamar Blvd., Arlington, Texas 76011-4511.

Plant performance for this issue has been determined to be in the licensee response band, and the NRC shall take no further actions on this matter.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice and Procedure," a copy of this letter, its enclosure, and your response, if you choose to provide one, will be made available electronically for public inspection in the NRC Public Document Room or from ADAMS, accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the Public without redaction.

Sincerely,

/RA/

Anton Vogel, Director
Division of Reactor Safety

Docket No. 50-397
License No. NPF-21

cc w/enclosure:
Electronic Distribution for
Columbia Generating Station

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ADAMS ACCESSION NUMBER: ML15196A591

<input checked="" type="checkbox"/> SUNSI Review By: MSH		ADAMS <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<input checked="" type="checkbox"/> Publicly Available <input type="checkbox"/> Non-Publicly Available		<input checked="" type="checkbox"/> Non-Sensitive <input type="checkbox"/> Sensitive		Keyword: NRC-002
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Letter to Mark E. Reddemann from Anton Vogel, dated July 14, 2015

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Electronic distribution by RIV:

Regional Administrator (Marc.Dapas@nrc.gov)
Deputy Regional Administrator (Kriss.Kennedy@nrc.gov)
DRP Director (Troy.Pruett@nrc.gov)
DRP Deputy Director (Ryan.Lantz@nrc.gov)
DRS Director (Anton.Vegel@nrc.gov)
DRS Deputy Director (Jeff.Clark@nrc.gov)
Senior Resident Inspector (Jeremy.Groom@nrc.gov)
Resident Inspector (Dan.Bradley@nrc.gov)
Site Administrative Assistant (Douglas.Bodine@nrc.gov)
Acting Branch Chief, DRP/A (Ryan.Alexander@nrc.gov)
Senior Project Engineer, DRP/A (Ryan.Alexander@nrc.gov)
Project Engineer, DRP/A (Thomas.Sullivan@nrc.gov)
State Liaison Officer (Bill.Maier@nrc.gov)
Public Affairs Officer (Victor.Dricks@nrc.gov)
Public Affairs Officer (Lara.Uselding@nrc.gov)
Project Manager (Balwant.Singal@nrc.gov)
Acting Team Leader, DRS/TSS (Eric.Ruesch@nrc.gov)
RITS Coordinator (Marisa.Herrera@nrc.gov)
ACES (R4Enforcement.Resource@nrc.gov)
Regional Counsel (Karla.Fuller@nrc.gov)
Technical Support Assistant (Loretta.Williams@nrc.gov)
Congressional Affairs Officer (Jenny.Weil@nrc.gov)
RIV Congressional Affairs Officer (Angel.Moreno@nrc.gov)
RIV/ETA: OEDO (Michael.Waters@nrc.gov)
ROPReports
RidsOeMailCenter Resource
OEWEB Resource
OE Specialist (Gladys.Figueroa@nrc.gov)