



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION IV
1600 EAST LAMAR BOULEVARD
ARLINGTON, TEXAS 76011-4511

January 19, 2022

Mr. Robert Schuetz
Chief Executive Officer
Energy Northwest
MD 1023
P.O. Box 968
Richland, WA 99352

SUBJECT: COLUMBIA GENERATING STATION – SECURITY BASELINE INSPECTION
REPORT 05000397/2021401

Dear Mr. Schuetz:

On November 19, 2021, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at Columbia Generating Station. Additional offsite inspection related activities continued through January 6, 2022, when the results of this inspection were discussed with you and other members of your staff. The results of this inspection are documented in the enclosed report.

No NRC-identified or self-revealing findings were identified during this inspection.

A licensee-identified violation which was determined to be of very low security significance is documented in this report. 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.

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 Kellar, Ray
on 01/19/22

Ray L. Kellar, P.E., Chief
Plant Support Branch 1
Division of Reactor Safety

Docket No. 05000397
License No. NPF-21

Enclosure:
Inspection Report 2021403

cc w/encl: Distribution via Listserv

COLUMBIA GENERATING STATION – SECURITY BASELINE INSPECTION REPORT
05000397/2021401 DATED – JANUARY 19, 2022

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U.S. NUCLEAR REGULATORY COMMISSION
Inspection Report

Docket Number: 05000397

License Number: NPF-21

Report Number: 05000397/2021401

Enterprise Identifier: I-2021-401-0006

Licensee: Energy Northwest

Facility: Columbia Generating Station

Location: Richland, WA

Inspection Dates: November 15, 2021 to January 6, 2022

Inspectors: D. Holman, Sr Physical Security Inspector

Approved By: Ray L. Kellar, P.E., Chief
Plant Support Branch 1
Division of Reactor Safety

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. A licensee-identified non-cited violation is documented in report section: 71130.08.

List of Findings and Violations

No findings or violations of more than minor significance were identified.

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 inspectors 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

71130.06 - Protection of Safeguards Information

The inspector evaluated material in the possession of the licensee informed by the Jensen Hughes Co. Memo To Appropriate Licensees, dated December 07, 2020, IP 71130.06 and DG SGI-1, Designation Guide for Safeguards Information.

Protection of Safeguards Information (1 Partial)

- (1) (Partial)
Reviewed 27 documents related to WPN2 system security engineering, all dated 1994 or 1995.

71130.08 - Fitness For Duty Program

The inspectors evaluated the fitness for duty program by completing the following inspection elements:

Fitness For Duty Program (1 Sample)

- (1)
- Tier I: All Requirements
 - Tier II: 24 Requirements (all but 02.07 and 02.08)
 - Tier III: 8 Requirements (all but 02.14 a, b, c)

INSPECTION RESULTS

Licensee-Identified Non-Cited Violation	71130.08
This violation of very low safety significance was identified by the licensee and has been entered into the licensee corrective action program and is being treated as a non-cited violation, consistent with Section 2.3.2 of the Enforcement Policy.	
Violation: While reviewing Action Request 425019 the inspector noted that Quality Assurance (QA) had identified regulatory requirements being implemented in FFDI-1.2 Drug Chemical Testing and Processing.	
Title 10, 26.27(c) requires, in part, that "each licensee shall prepare, implement, and maintain written procedures that describe the methods to be used in implementing the FFD policy and	

the requirements of this part.” Contrary to this requirement, from January 1, 2009 to September 7, 2021, the licensee did not prepare, implement, and maintain written procedures to be used in implementing the requirements of part 26. Specifically, regulatory requirements according to 26.31(b) and 26.85(a)(b) and (c) were implemented in lower tier document FFDI 1.2, Drug Chemical Testing and Processing, Rev 27.

Significance/Severity: Green. When processed through the PPSDP this issue screened out as 1 point, 0-6 being green under the Physical Protection Severity Determination Process.

Corrective Action References: Action Request 427310

EXIT MEETINGS AND DEBRIEFS

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

- On January 6, 2022, the inspectors presented the security baseline inspection results to you and other members of the licensee staff.

DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71130.06	Miscellaneous	DG-SGI-1	USNRC Designation Guide for Safeguards Information	September 2005
	Miscellaneous	Memo, 10 pages,	Framingham Office Safeguards Information Discover, Transfer, and Assessment	12/07/2020
71130.08	Corrective Action Documents	361880, 364412, 364704, 365462, 373755, 377350, 373302, 391935, 392208, 425017, 425019	Action Request	various
71130.08	Corrective Action Documents Resulting from Inspection	427310, 427311, 428902	Action Request	2021 and 2022
	Miscellaneous	CLIA #: 5000696092	Environmental Services, EMIT Laboratory Quality Assurance Plan	4/20/2017
	Miscellaneous	Contract 314993	MEDTOX Laboratories, INC., Amendment Document	12/07/2020
	Miscellaneous	Contract 315193	Elsohly Laboratories, Amendment Document	10/09/2020
	Miscellaneous	Federal Register / Vol. 73, No. 62	Statements of Consideration, Part 26	3/31/2008
	Miscellaneous	FFDI-1.2	Drug Chemical Testing and Processing	027
	Miscellaneous	FFDI-1.3	Random Selection Process and Backlog List Tracking - Random Testing	020
	Miscellaneous	Form 26476	FFD Consent/Collection Form - Screening and Specimen Collection	6
	Miscellaneous	NEI 03-01	Nuclear Power Plant Access Authorization Program	4
	Miscellaneous	Pamphlet	ENW FFD Policy	None
	Miscellaneous	SALI E 06	Supplemental Analytical Laboratory Instructions	10
	Procedures	PSM-4.6	Fitness for Duty Policy	005
	Procedures	SWP-FFD-01	Fitness for Duty Program Requirements	019 and 022
	Procedures	SWP-FFD-05	Medical Review Officer (MRO and Substance Abuse Expert (SAE))	000

