



**ENERGY
NORTHWEST**

David A. Swank
Columbia Generating Station
P.O. Box 968, PE23
Richland, WA 99352-0968
Ph. 509-377-2309 | F. 509-377-2354
daswank@energy-northwest.com

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10 CFR 2.202
10 CFR 50.4

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Subject: **COLUMBIA GENERATING STATION, DOCKET NO. 50-397
ENERGY NORTHWEST'S RESPONSE TO NRC ORDER EA-12-051 –
OVERALL INTEGRATED PLAN FOR RELIABLE SPENT FUEL POOL
INSTRUMENTATION**

- References:
1. NRC Order EA-12-051, "Order to Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," March 12, 2012
 2. NRC Interim Staff Guidance JLD-ISG-2012-03, "Compliance with Order EA-12-051, Reliable Spent Fuel Pool Instrumentation," Revision 0, August 29, 2012
 3. NEI 12-02, "Industry Guidance for Compliance with NRC Order EA-12-051, 'To Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation'," Revision 1, August 2012

Dear Sir or Madam:

On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued the referenced Order (Reference 1) to Columbia Generating Station (Columbia). Reference 1 directs Columbia to have reliable spent fuel pool level instrumentation. Specific implementation guidelines are outlined in Attachment 2 of Reference 1. Full implementation is required no later than either two refueling cycles after submittal of the overall integrated plan or by December 31, 2016, whichever comes first.

Reference 1 requires submittal of an overall integrated plan by February 28, 2013. The interim staff guidance (Reference 2) for reliable spent fuel pool instrumentation was issued August 29, 2012, which endorses industry guidance document NEI 12-02 Revision 1 (Reference 3) with some clarifications and exceptions identified. NEI 12-02 (Reference 3) provides direction regarding the content of the overall integrated plan. The purpose of this letter is to provide the overall integrated plan pursuant to Section IV, Condition C.1.a, of Reference 1.

ADD 1

**ENERGY NORTHWEST'S RESPONSE TO NRC ORDER EA-12-051 – OVERALL
INTEGRATED PLAN FOR RELIABLE SPENT FUEL POOL INSTRUMENTATION**

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Energy Northwest believes that this submittal contains some information that should not be made publicly available. Energy Northwest requests that Attachment 1 to this submittal be withheld from public disclosure in accordance with 10 CFR 2.390(d)(1).

This letter does not contain any new or revised Regulatory Commitments.

If you have any questions or require additional information, please contact Ms. L. L. Williams at (509) 377-8148.

On the date of this letter, I declare under penalty of perjury that the foregoing is true and correct.

Respectfully,



D. A. Swank
Assistant Vice President, Engineering

Attachment 1: Overall Integrated Plan for Reliable Spent Fuel Pool Instrumentation

cc: NRC Region IV Administrator
NRC NRR Project Manager
NRC Senior Resident Inspector/988C
AJ Rapacz – BPA/1399