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February 28, 2013  
GO2-13-034

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-12-049 –  
OVERALL INTEGRATED PLAN FOR MITIGATING STRATEGIES**

- References:
1. NRC Order EA-12-049, "Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond Design Basis External Events," March 12, 2012
  2. NRC Interim Staff Guidance JLD-ISG-2012-01, "Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," Revision 0, August 29, 2012
  3. NEI 12-06, "Diverse and Flexible Coping Strategies (FLEX) Implementation Guide," Revision 0, August 2012
  4. Letter GO2-12-149 dated October 25, 2012, DA Swank (Energy Northwest) to the Nuclear Regulatory Commission, "Energy Northwest's Initial Status Report In Response To March 12, 2012 Commission Order Modifying Licenses With Regard To Requirements for Mitigation Strategies for Beyond-Design-Basis External Events"

Dear Sir or Madam,

On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued Order EA-12-049 (Reference 1) to Columbia Generating Station (Columbia). The Order was immediately effective and contains requirements for mitigation strategies for beyond design basis external events. Specific requirements are outlined in Attachment 2 of the Order.

The Order requires Energy Northwest to submit an Overall Integrated Plan by February 28, 2013. The interim staff guidance (Reference 2) endorses industry guidance document NEI 12-06 Revision 0 (Reference 3) with some clarifications identified. The receipt of the guidance was confirmed by Energy Northwest in its initial status report provided in Reference 4.

AISI  
NRR

**ENERGY NORTHWEST'S RESPONSE TO NRC ORDER EA-12-049 – OVERALL INTEGRATED PLAN FOR MITIGATING STRATEGIES**

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The enclosure to this letter contains the Overall Integrated Plan required by Section IV, Condition C.1 of the Order. The submittal provides Energy Northwest's initial description of its plan to meet the requirements of the referenced Order. Information provided in the plan reflects preliminary strategies that are not yet finalized. Accordingly, the plan is subject to change as strategies, procedures, and modifications are finalized and equipment is procured. Significant changes to the plan or the proposed schedule will be communicated to the NRC in subsequent status reports.

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,



A. L. Javorik  
Vice President, Engineering

*Attachment 1 -*

Enclosure: Overall Integrated Plan for Mitigating Strategies for Beyond-Design-Basis External Events

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