



**ENERGY
NORTHWEST**

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February 27, 2015
GO2-15-032

EA-12-051

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

**Subject: COLUMBIA GENERATING STATION, DOCKET NO. 50-397
ENERGY NORTHWEST'S FOURTH SIX-MONTH STATUS UPDATE
REPORT FOR THE IMPLEMENTATION OF NRC ORDER EA-12-051
RELIABLE SPENT FUEL POOL INSTRUMENTATION**

- References:**
1. NRC Order EA-12-051 dated March 12, 2012, "Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation"
 2. Letter GO2-13-036, dated February 28, 2013, from DA Swank (Energy Northwest) to NRC, "Energy Northwest's Response to NRC Order EA-12-051 - Overall Integrated Plan for Reliable Spent Fuel Pool Instrumentation"
 3. Letter dated June 20, 2013, from LK Gibson (NRC) to ME Reddemann (Energy Northwest), "Columbia Generating Station - Request for Additional Information Regarding Spent Fuel Pool Instrumentation (TAC No. MF0797)"
 4. Letter GO2-13-100, dated July 19, 2013, from DA Swank (Energy Northwest) to NRC, "Energy Northwest's Response to Request for Additional Information Related to the Overall Integrated Plan for Spent Fuel Pool Instrumentation"
 5. Letter GO2-13-121, dated August 23, 2013, from DA Swank (Energy Northwest) to NRC, "Energy Northwest's First Six Month Status Update Report for the Implementation of NRC Order EA-12-051 Reliable Spent Fuel Pool Instrumentation"
 6. Letter dated November 7, 2013, from CF Lyon (NRC) to ME Reddemann (Energy Northwest), "Columbia Generating Station - Interim Staff Evaluation and Request for Additional Information Regarding the Overall Integrated Plan for Implementation of Order EA-12-051, Reliable Spent Fuel Pool Instrumentation (TAC No. MF0797)"

ADD
NRR

**ENERGY NORTHWEST'S FOURTH SIX-MONTH STATUS UPDATE REPORT FOR
THE IMPLEMENTATION OF NRC ORDER EA-12-051 RELIABLE SPENT FUEL
POOL INSTRUMENTATION**

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Dear Sir or Madam,

In Reference 1, the Nuclear Regulatory Commission (NRC) issued Order EA-12-051 which directed Energy Northwest's Columbia Generating Station (Columbia) to have a reliable means of remotely monitoring wide range spent fuel pool levels to support effective prioritization of event mitigation and recovery actions for a beyond-design-basis external event. The Order also requires submission of a status update at six-month intervals following the licensee's submittal of the Overall Integrated Plan provided in Reference 2.

ATTACHMENTS

The attachment to this letter provides Energy Northwest's fourth six-month report of Columbia's status of implementing Order EA-12-051 pursuant to Section IV, Condition C.2 of Reference 1. As stated in the Memorandum dated December 26, 2014, from C. A. Hunt (NRC) to M. A. Mitchell (NRC), "Summary of the November 26, 2013, Public Meeting to Discuss Industry Responses to Staff Interim Evaluations for Spent Fuel Pool Instrumentation," (ML13347B030) the staff clarified that the staff interim evaluation questions supersede any previous requests for information issued by the staff concerning the spent fuel instrumentation. Therefore, no updates to the RAIs discussed in References 3, 4, or 5 were provided.

Energy Northwest has completed the development of the responses to the RAIs contained in Reference 6 and has posted the responses to the E-portal as requested.

There are no new or revised regulatory commitments contained in this letter. If you have any questions or require additional information, please contact Ms. L. L. Williams at (509) 377-8148.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 26th day of February, 2015

Respectfully,



D.A. Swank
Assistant Vice President, Engineering

Attachment: Fourth Six-Month Status Update Report for the Overall Integrated Plan for
Reliable Spent Fuel Pool Instrumentation

cc: NRC Region IV Administrator
NRC NRR Project Manager
NRC Senior Resident Inspector/988C
MA Jones – BPA/1399 (email)

ENERGY NORTHWEST'S FOURTH SIX-MONTH STATUS UPDATE REPORT FOR THE IMPLEMENTATION OF NRC ORDER EA-12-061 RELIABLE SPENT FUEL POOL INSTRUMENTATION

IN RE: COLUMBIAN GENERATING STATION

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... the regulatory Commission (NRC) issued Order EA-12-061 regarding the implementation of reliable spent fuel pool instrumentation at the Columbia Generating Station. The Commission's order requires the licensee to submit a comprehensive plan for the implementation of the instrumentation, including a description of the instrumentation to be installed, the methods for testing and calibration, and the procedures for the maintenance and repair of the instrumentation. The licensee has submitted a plan for the implementation of the instrumentation, and the Commission is currently reviewing the plan. The licensee has also submitted a request for a revision to the plan, and the Commission is currently reviewing the request. The licensee has also submitted a request for a waiver of the requirements of the order, and the Commission is currently reviewing the request.

ATTACHMENT

COLUMBIAN GENERATING STATION, DOCKET NO. 50-397

FOURTH SIX-MONTH STATUS UPDATE REPORT FOR THE OVERALL INTEGRATED PLAN FOR RELIABLE SPENT FUEL POOL INSTRUMENTATION

... The licensee has submitted a request for a revision to the plan, and the Commission is currently reviewing the request. The licensee has also submitted a request for a waiver of the requirements of the order, and the Commission is currently reviewing the request.

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FOURTH SIX-MONTH STATUS UPDATE REPORT FOR THE OVERALL INTEGRATED PLAN FOR RELIABLE SPENT FUEL POOL INSTRUMENTATION

Attachment
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1.0 Introduction

In Reference 1, the Nuclear Regulatory Commission (NRC) issued Order EA-12-051 which directed Energy Northwest's Columbia Generating Station (Columbia) to have a reliable means of remotely monitoring wide range spent fuel pool (SFP) levels to support effective prioritization of event mitigation and recovery actions for a beyond-design-basis external event. Energy Northwest developed an Overall Integrated Plan (Reference 2) documenting the requirements to install reliable SFP level instrumentation in response to NRC Order EA-12-051. The Order also requires submission of a status update at six-month intervals following the licensee's submittal of the Overall Integrated Plan.

This is Energy Northwest's fourth six-month report of Columbia's status of implementing Order EA-12-051 pursuant to Section IV, Condition C.2 of Reference 1 and provides an update of milestone accomplishments since the previous update of August 2014, (Reference 8). Changes are identified by a revision bar in the right column or margin.

2.0 Milestone Accomplishments

The following milestones have been completed since the last submittal on August 28, 2014.

1. Submittal of the Fourth Status Update Report for the Reliable SFP Instrumentation Integrated Plan.
2. Posting to the E-portal the responses to the requests for additional information identified in Reference 6.

3.0 Milestone Schedule Status

The following provides an updated milestone schedule to support the Reliable SFP Instrumentation Overall Integrated Plan. Some changes to the schedule have been made as shown by the revision bars as the required vendor information was delayed.

**FOURTH SIX-MONTH STATUS UPDATE REPORT FOR THE
OVERALL INTEGRATED PLAN FOR RELIABLE SPENT FUEL POOL
INSTRUMENTATION**

Attachment
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Milestones	Target Completion Date	Activity Status	Revised Target Completion Date
Correspondence & Reports:			
Submit 60 Day Reliable SFP Instrumentation Status Report	Oct 2012	Completed	N/A
Submit Overall Reliable SFP Instrumentation Integrated Plan	Feb 2013	Completed	N/A
First Status Update Report for the Reliable SFP Instrumentation Integrated Plan	Aug 2013	Completed	N/A
Second Status Update Report for the Reliable SFP Instrumentation Integrated Plan	Feb 2014	Completed	N/A
Third Status Update Report for the Reliable SFP Instrumentation Integrated Plan	Aug 2014	Completed	N/A
Fourth Status Update Report for the Reliable SFP Instrumentation Integrated Plan	Feb 2015	Completed	N/A
Final Completion Report for the Reliable SFP Instrumentation Integrated Plan	Feb 2015	Not Started	N/A
Engineering & Modifications:			
Commence Engineering Detailed Design for the Reliable SFP Instrumentation	Mar 2013	Completed	N/A
Complete Engineering Detailed Design for the Reliable SFP Instrumentation	Aug 2014	Completed	Jun 2014
Commence the Reliable SFP Instrumentation Modification Installation	Jul 2014	Started	Apr 2015

**FOURTH SIX-MONTH STATUS UPDATE REPORT FOR THE
OVERALL INTEGRATED PLAN FOR RELIABLE SPENT FUEL POOL
INSTRUMENTATION**

Attachment
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Milestones	Target Completion Date	Activity Status	Revised Target Completion Date
Reliable SFP Instrumentation Channels Operational	Dec 2014	Started	Jun 2015
Program & Procedures:			
Develop the Reliable SFP instrumentation testing, calibration, maintenance, surveillance, and operational procedures	Apr 2014	Started	Jun 2015
Establish programmatic controls on SFP instrumentation related activities	Apr 2015	Not Started	N/A
Operations & Training:			
Commence development of the Reliable SFP Instrumentation training modules	Apr 2014	Completed	N/A
Complete development of the Reliable SFP Instrumentation training modules	May 2014	Started	May 2015
Complete training of station personnel	Oct 2014	Started	Jun 2015
Functional testing of Reliable SFP Instrumentation SSCs complete	Dec 2014	Not Started	Apr 2015
Reliable SFP Instrumentation Program turned over to Operations	Jun 2015	Not Started	Jun 2015

**FOURTH SIX-MONTH STATUS UPDATE REPORT FOR THE
OVERALL INTEGRATED PLAN FOR RELIABLE SPENT FUEL POOL
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4.0 Changes to Compliance Method

The Overall Integrated Plan (submitted in Reference 2) indicated that there would be an alternate display location. However, this concept was revised as identified in Reference 5. As a result, the reliable SFP instrumentation, primary and backup instrument channel display will only be located in the main control room. No other changes have been made to the compliance method and the design continues to meet the guidelines of JLD-ISG-2012-13 and NEI 12-02 section 3.9.

5.0 Need for Relief/Relaxation and Basis for the Relief/Relaxation

At this time, Energy Northwest expects to fully comply with the Order and its implementation date and does not anticipate a request for relief and/or relaxation of the Order.

6.0 Open Items

In Reference 3, the NRC requested additional information with regard to the Overall Integrated Plan and in Reference 4 Energy Northwest responded to that request with the understanding that the completed responses will be provided to the NRC in a future updated status report. In Reference 5, Energy Northwest provided the first 6-month update. However, in the Memorandum dated December 26, 2014, from C. A. Hunt (NRC) to M. A. Mitchell (NRC), "Summary of the November 26, 2013, (ML13347B030) Public Meeting to Discuss Industry Responses to Staff Interim Evaluations for Spent Fuel Pool Instrumentation," the staff clarified that the interim staff evaluation (Reference 6) questions supersede any previous requests for information issued by the staff concerning the spent fuel instrumentation. Therefore, no updates to the RAIs discussed in References 3, 4, or 5 were provided.

Energy Northwest has completed the development of the responses to the RAIs contained in Reference 6 and has posted the responses to the E-portal as requested.

7.0 Potential Draft Safety Evaluation Impacts

At this time, Energy Northwest does not believe there are any potential impacts to the Draft Safety Evaluation.

8.0 References

1. NRC Order EA-12-051 dated March 12, 2012, "Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation"

**FOURTH SIX-MONTH STATUS UPDATE REPORT FOR THE
OVERALL INTEGRATED PLAN FOR RELIABLE SPENT FUEL POOL
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7. Letter GO2-14-030, dated February 27, 2014, from DA Swank (Energy Northwest) to NRC, "Energy Northwest's Second Six-Month Status Update Report for the Implementation of NRC Order EA-12-051 Reliable Spent Fuel Pool Instrumentation"
8. Letter GO2-14-130, dated August 28, 2014, from DA Swank (Energy Northwest) to NRC, "Energy Northwest's Third Six-Month Status Update Report for the Implementation of NRC Order EA-12-051 Reliable Spent Fuel Pool Instrumentation"