



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

October 20, 2016

Mr. Mark E. Reddemann  
Chief Executive Officer  
Energy Northwest  
MD 1023  
76 North Power Plant Loop  
P.O. Box 968  
Richland, WA 99352

SUBJECT: NUCLEAR REGULATORY COMMISSION PLAN FOR THE AUDIT OF ENERGY NORTHWEST'S FLOOD HAZARD REEVALUATION REPORT SUBMITTAL RELATING TO THE NEAR-TERM TASK FORCE RECOMMENDATION 2.1- FLOODING FOR COLUMBIA GENERATING STATION (CAC NO. MF8455)

Dear Mr. Reddemann:

This letter documents the U.S Nuclear Regulatory Commission (NRC) staff's plan to perform a regulatory audit of Energy Northwest's (the licensee's) supporting calculations of the Flood Hazard Reevaluation Report (FHRR) submittal related to the Near-Term Task Force Recommendation 2.1 for Columbia Generating Station (CGS). This technical audit will be performed consistent with NRC Office of Nuclear Reactor Regulation, Office Instruction LIC-111, "Regulatory Audits," dated December 29, 2008 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML082900195). The audit will be conducted over multiple sessions, as needed, and the NRC staff will develop an audit summary report to document its observations and conclusions within 90 days of the final audit session.

The audit will provide the NRC staff with a better understanding of the CGS FHRR, which was submitted on October 6, 2016 (ADAMS Accession No. ML16286A309, non-public). Specifically, the audit will provide the NRC with a better understanding of the analyses of the flooding hazards presented in the CGS FHRR. The audit is intended to support completion of the staff's review of the FHRR and the subsequent issuance of a staff assessment.

The enclosed audit plan outlines the process that will allow the NRC staff to identify additional information that may be necessary for licensees to supplement their FHRRs, and resolve any technical concerns. The details of this audit have been discussed with Mr. Richard Rogalski of your staff.

M. Reddemann

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If you have any questions, please contact me at (301) 415-1056 or by e-mail at [Lauren.Gibson@nrc.gov](mailto:Lauren.Gibson@nrc.gov).

Sincerely,

A handwritten signature in black ink that reads "Lauren Kate Gibson". The signature is written in a cursive, flowing style.

Lauren K. Gibson, Project Manager  
Hazards Management Branch  
Japan Lessons-Learned Division  
Office of Nuclear Reactor Regulation

Docket No. 50-397

Enclosure:  
Audit Plan

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NRC PLAN FOR THE AUDIT OF ENERGY NORTHWEST'S FLOOD HAZARD  
REEVALUATION REPORT SUBMITTAL RELATING TO THE NEAR-TERM TASK FORCE  
RECOMMENDATION 2.1-FLOODING FOR COLUMBIA GENERATING STATION

BACKGROUND AND AUDIT BASIS

By letter dated March 12, 2012, the U.S. Nuclear Regulatory Commission (NRC) issued a request for information to all power reactor licensees and holders of construction permits in active or deferred status, pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.54(f), "Conditions of license" (hereafter referred to as the "50.54(f) letter"). The request was issued in connection with implementing lessons learned from the 2011 accident at the Fukushima Dai-ichi nuclear power plant, as documented in the report of the NRC's Near-Term Task Force. Recommendation 2.1 of that document recommended that the staff issue orders to all licensees to reevaluate seismic and flooding hazards for their sites against current NRC requirements and guidance. Subsequent staff requirements memoranda associated with SECY 11-0124 and SECY-11-0137 instructed the NRC staff to issue requests for information to licensees pursuant to 10 CFR 50.54(f).

By letter dated October 6, 2016 (Agencywide Documents Access and Management System Accession No. ML16286A309), Energy Northwest (EN, the licensee) submitted its Flood Hazard Reevaluation Report (FHRR) for Columbia Generating Station (CGS) in response to the 50.54(f) letter. The NRC staff has begun its review of the aforementioned submittal and plans to conduct a regulatory audit of EN to aid in its review of the licensee's FHRR.

REGULATORY AUDIT SCOPE AND METHODOLOGY

The areas of focus for the regulatory audit are the information contained in the CGS FHRR submittal, and all associated and relevant supporting documentation used in the development of the aforementioned document including, but not limited to, methodology, process information, calculations, computer models, etc. The audit will be conducted and completed over several meetings as necessary.

Enclosure

**INFORMATION AND OTHER MATERIAL NECESSARY FOR THE REGULATORY AUDIT**

The information required for the audit is the licensee's revised model and supporting calculations, as well as documentation related to the local intense precipitation analyses. Other information needs will be discussed as audit meetings are scheduled.

**NRC AUDIT TEAM**

<b>Title</b>	<b>Team Member</b>	<b>Affiliation</b>
Team Leader, NRR/JLD	Lauren Gibson	NRC
Branch Chief, NRO/DSEA	Chris Cook	NRC
Branch Chief, NRO/DSEA	Michelle Bensi	NRC
Technical Lead	Ken See	NRC
Technical Support	Various Contractors	Taylor Engineering

**LOGISTICS**

The audit meetings will be coordinated with EN staff.

**DELIVERABLES**

The NRC team will develop an audit summary report to convey the audit results. The report will be placed in ADAMS within 90 days of the completion of the final audit session, and will be publicly available.

The information discussed in the audit may be included, fully or in part, in the development of the staff assessment as a result of the NRC staff's review of the FHRR. The NRC staff will request the licensee to submit any specific information the NRC staff needs to complete its staff assessment.

M. Reddemann

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If you have any questions, please contact me at (301) 415-1056 or by e-mail at [Lauren.Gibson@nrc.gov](mailto:Lauren.Gibson@nrc.gov).

Sincerely,

**/RA/**

Lauren K. Gibson, Project Manager  
Hazards Management Branch  
Japan Lessons-Learned Division  
Office of Nuclear Reactor Regulation

Docket No. 50-397

Enclosure:  
Audit Plan

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**ADAMS Accession No.: ML16291A533**

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