



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**  
REGION IV  
1600 E LAMAR BLVD  
ARLINGTON, TX 76011-4511

July 6, 2015

EA-15-038

Mr. Mark E. Reddemann, Chief Executive Officer  
Energy Northwest  
P.O. Box 968 (Mail Drop 1023)  
Richland, WA 99352-0968

**SUBJECT: SUMMARY OF A REGULATORY CONFERENCE TO DISCUSS THE SAFETY SIGNIFICANCE OF A COLUMBIA GENERATING STATION FINDING THAT EMERGENCY PLAN IMPLEMENTING PROCEDURES DID NOT IMPLEMENT SOME PROTECTIVE ACTION RECOMMENDATIONS REQUIRED BY THE EMERGENCY PLAN**

Dear Mr. Reddemann:

On June 15, 2015, members of the U.S. Nuclear Regulatory Commission (NRC) staff met with representatives of Columbia Generating Station to discuss the apparent violation as documented in NRC Inspection Report 05000397/2015502 (ML15127A534). The purpose of the regulatory conference was to discuss your position with respect to the facts and assumptions used by the NRC to make our preliminary safety significance determination, and to allow you to present any new information that may assist us in arriving at the final significance of the finding.

During the meeting, your staff described your assessment of the finding and its significance. Specifically, your staff provided information that,

- Columbia Generating Station developed emergency plan implementing Procedure 13.2.2, "Determining Protective Action Recommendations," Revision 18, in consultation with cognizant offsite authorities and according to the guidance of NUREG-0654 Supplement 3, "Guidance for Protective Action Strategies," dated November 2011;
- The Columbia emergency response organization understands Procedure 13.2.2 to require consideration of shelter-in-place in arriving at any change to an initial protective action recommendation;
- The Columbia emergency response organization understands Procedure 13.2.2 to require development of a protective action recommendation for planned and puff releases of airborne radioactive material, and

- Procedure 13.2.2 directs that protective action recommendations for areas outside of the plume exposure pathway emergency planning zone be developed by the technical support center or emergency operations facility because such recommendations require actual environmental measurements to be accurate and to avoid unnecessary protective actions. Only the technical support center or emergency operations facility can direct the collection of environmental measurements.

Your staff acknowledged that Procedure 13.2.2 was not clear in all respects concerning a shelter-in-place recommendation and planned or puff releases, and that you relied upon an Emergency Coordinator's training and experience to use Procedure 13.2.2 to make the appropriate recommendations to offsite authorities.

A copy of the handout you provided at this meeting can be found in the NRC's Agencywide Documents Access and Management System (ADAMS) (ML15163A180).

The NRC staff asked questions during the regulatory conference to clarify its understanding of the information presented. The NRC will continue to review the information that you provided during the regulatory conference and the subsequent information that was requested to reach a final significance determination. We are developing our final risk significance and will issue a final significance determination letter in July 2015.

Meeting attendance rosters for Region IV and teleconference are provided as enclosures to this letter. This regulatory conference was transcribed; the transcript is available in the NRC's Agencywide Documents Access and Management System (ADAMS, ML15168A238). This Category 1 public meeting was attended telephonically by five members of the public, six individuals from other government agencies, one individual from Energy Northwest, and other staff of the NRC, licensee, and nuclear industry.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice and Procedure," a copy of this letter and its enclosures will be available electronically for public inspection in the NRC's Public Document Room or from the Publicly Available Records (PARS) component of the NRC's ADAMS. ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

*/RA/*

Mark S. Haire, Branch Chief  
Plant Support Branch 1  
Division of Reactor Safety

Docket No. 50-397  
License No. NPF-21

Enclosures:

1. Meeting Attendance at Region IV
2. Meeting Attendance by Teleconference

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Mark S. Haire, Branch Chief  
Plant Support Branch 1  
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Distribution:

See next page

ADAMS Accession Number: ML15187A444

ADAMS Package Number: ML15187A445

<input checked="" type="checkbox"/> SUNSI Review		ADAMS		<input checked="" type="checkbox"/> Publicly Available		<input checked="" type="checkbox"/> Non-Sensitive		Keyword: RGN-002
By: MSH		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Non-Publicly Available		<input type="checkbox"/> Sensitive		
OFFICE	RIV/DRS	RIV/DRS	RIV/DRP	RIV/DRS	RIV/ACES	RIV/DRS		
NAME	PEIkmann	MHaire	JDixon	AVegel	MHay	MHaire		
SIGNATURE	/RA/	/RA/	/RA/	/RA/	/RA/	/RA/		
DATE	7/1/15	7/1/15	7/2/15	7/2/15	7/6/15	7/6/15		

Letter to Mark E. Reddemann from Mark S. Haire, dated July 6, 2015

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cc w/ encl:  
Electronic Distribution for Columbia Generating Station

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# ATTENDEES

NRC	Columbia Generating Station
<ul style="list-style-type: none"> <li>• Marc Dapas, Regional Administrator</li> <li>• Troy Pruett, Director, DRP</li> <li>• Jeff Clark, Deputy Director, DRS</li> <li>• Karla Fuller, Regional Counsel</li> <li>• Wayne Walker, Branch Chief, DRP</li> <li>• Mark Haire, Branch Chief, DRS</li> <li>• Robert Kahler, Branch Chief, Division of Preparedness and Response, Office of Nuclear Security and Incident Response</li> <li>• Paul Elkmann, Senior Emergency Preparedness Inspector, DRS</li> <li>• Rachel Browder, Senior Enforcement Specialist, RIV</li> <li>• Gilbert Guerra, Emergency Preparedness Inspector, DRS</li> <li>• Christi Maier, Enforcement Specialist, RIV</li> </ul>	<ul style="list-style-type: none"> <li>• Grover Hettel, Vice President of Operations</li> <li>• Andy Black, Emergency Services General Manager</li> <li>• Kurt Gosney, Acting Emergency Services General Manager</li> <li>• Don Gregoire, Regulatory Affairs Manager</li> <li>• Dave Brown, Manager Planning/Scheduling/Outage</li> <li>• Sean Clizbe, Emergency Preparedness Manager</li> <li>• A. J. Fahnestock, EP Program Manager</li> <li>• J. R. Trautvetter, Regulatory Compliance Supervisor</li> <li>• Desiree Wolfgramm, Compliance Engineer</li> </ul>

## **PARTICIPANTS ON TELECONFERENCE**

William Maier, Regional State Liaison Officer, Region IV, U.S. NRC

Jeremy Groom, Senior Resident Inspector, DRP, Region IV, U.S. NRC

Steven LaVie, Senior Emergency Preparedness Specialist, Division of Preparedness and Response, Office of Nuclear Security and Incident Response, U.S. NRC

Randolph Sullivan, Senior Emergency Preparedness Specialist, Division of Preparedness and Response, Office of Nuclear Security and Incident Response, U.S. NRC

Eric Schrader, Emergency Preparedness Specialist, Division of Preparedness and Response, Office of Nuclear Security and Incident Response, U.S. NRC

Todd Smith, Emergency Preparedness Specialist, Division of Preparedness and Response, Office of Nuclear Security and Incident Response, U.S. NRC

Gladys Figueroa, Enforcement Specialist, Office of Enforcement, U.S. NRC

Lauren Casey, Enforcement Coordinator, Office of Nuclear Reactor Regulation, U.S. NRC

Mary Johansen, U.S. NRC

Bill Webb, Branch Chief, Technological Hazards Branch, U.S. Federal Emergency Management Agency, Region X

Ryan Brice, Washington State Department of Health

David Jansen, Washington State Department of Health

Mark Henry, Washington State Department of Health

Mark Reese, Oregon Department of Energy

Sean Davis, Franklin County, Washington, Emergency Management

John Dobken, Energy Northwest

Michael Kirk, Intercon

Charles K. Johnson, OR and WA Physicians for Social Responsibility

Mr. Kirk, WRPS

D. Kidwell

Deborah Nichols