



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION IV  
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ARLINGTON, TEXAS 76011-4005

March 2, 2005

J. V. Parrish (Mail Drop 1023)  
Chief Executive Officer  
Energy Northwest  
P.O. Box 968  
Richland, WA 99352-0968

SUBJECT: ANNUAL ASSESSMENT LETTER - COLUMBIA GENERATING STATION  
(REPORT 05000397/2005001)

Dear Mr. Parrish:

On February 1, 2005, the NRC staff completed its end-of-cycle plant performance assessment of Columbia Generating Station. The end-of-cycle review for Columbia Generating Station involved the participation of the reactor technical divisions in evaluating performance indicators (PIs) for the most recent quarter and inspection results for the period from January 1 through December 31, 2004. The purpose of this letter is to inform you of our assessment of your safety performance during this period and our plans for future inspections at your facility so that you will have an opportunity to prepare for these inspections and to inform us of any planned inspections that may conflict with your plant activities.

This performance review and enclosed inspection plan do not include physical protection information. A separate end-of-cycle performance review letter designated and marked as "Exempt from Public Disclosure in Accordance with 10 CFR 2.390" will include the physical protection review and resultant inspection plan.

Overall, Columbia Generating Station operated in a manner that preserved public health and safety and fully met all cornerstone objectives. Plant performance for the most recent quarter, as well as for the first three quarters of the assessment cycle, was within the Licensee Response Column of the NRC's Action Matrix, based on all inspection findings being classified as having very low safety significance (Green) and all PIs indicating performance at a level requiring no additional NRC oversight (Green). Therefore, we plan to conduct only reactor oversight process (ROP) baseline inspections at your facility through September 30, 2006.

Additionally, the staff has identified a substantive crosscutting issue in the area of human performance. Human performance issues with a common performance characteristic of personnel performance, contributed to a number of Green findings in the initiating events, mitigating systems, barrier integrity, emergency preparedness and occupational radiation safety cornerstones.

The findings principally involved instances of failing to follow procedures or a lack of understanding of the procedural requirements and the impact on plant operations. Findings related to this substantive human performance crosscutting issue have resulted in either plant

transients or scrams, and have resulted in inadequate responses to plant conditions both from an operational and radiological standpoint. There were two findings that involved inappropriate manipulation and operation of plant equipment that resulted in plant transients. There were five findings related to control board awareness and operation of plant equipment, one of which resulted in a manual scram and another which resulted in a prolonged delay in determining that a valid reactor protection system actuation had occurred. In addition to the personnel errors that impacted plant operations and the assessment of plant conditions, there were two occurrences involving radiological protection personnel not conducting adequate surveys and an instance in which operations did not initiate plant monitoring capabilities in a timely manner to provide the NRC with real time assessment of plant conditions.

Although Energy Northwest has implemented a program to address performance, human performance problems that have challenged the plant continue to occur. The NRC considered the actions Energy Northwest has taken to date with regard to improving human performance at Columbia Generating Station. Energy Northwest implemented an improvement program in November 2003 to address, in part, training in operations, excellence in the different departments, and behavior based programs. Energy Northwest met with the NRC in January 2004 to discuss, in part, its improvement program; however, the program was not fully effective in preventing the human performance personnel errors identified throughout the assessment period. Also, Energy Northwest met with NRC in October 2004 to discuss its response to operational performance issues; however, Energy Northwest has not demonstrated through the implementation of the Operations Department Performance Improvement Plan that the issues involving operator knowledge of systems and the emergency plan have been adequately addressed to ensure the corrective actions are effective.

The NRC will review this substantive crosscutting issue to determine whether operator performance has improved and to determine whether the Operations Department Performance Improvement Plan has been effective. We will focus on these areas through implementation of the baseline inspection program. Our followup efforts will be accomplished as a followup inspection item in accordance with Inspection Procedure 71152, "Identification and Resolution of Problems," Section 03.02, "Selected Issue Followup Inspection," and through semi-annual reviews conducted during the next midcycle review. In addition, the Problem Identification and Resolution team inspection will be performed in the first half of 2005 and will focus, in part, on Energy Northwest's actions to address human performance. Demonstrated improved performance should be reflected, in part, in a reduced number of human performance related inspection findings.

In our end-of-cycle letter dated March 3, 2004, and in our midcycle letter dated August 30, 2004, we advised you of a substantive crosscutting issue in the area of problem identification and resolution. Problem identification and resolution issues contributed to a number of Green findings in the mitigating systems, barrier integrity, and occupational radiation safety cornerstones. The common performance characteristic of these findings primarily involved a lack of rigor with regard to aggressively identifying and correcting problems with plant design information. During this assessment period, there were fewer findings related to this area. Improvements in this area appear to be a direct result of your improvement initiatives in the engineering area. This issue has been satisfactorily addressed and the NRC plans no further focused inspections for this substantive crosscutting issue.

The enclosed inspection plan details the inspections, less those related to physical protection, scheduled through September 30, 2006. The inspection plan is provided to minimize the resource impact on you staff and to allow for scheduling conflicts and personnel availability to be resolved in advance of inspector arrival onsite. Routine resident inspections are not listed due to their ongoing and continuous nature. The inspections in the last 9 months of the inspection plan are tentative and may be revised at the midcycle review meeting.

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

If circumstances arise which cause us to change this inspection plan, we will contact you to discuss the change as soon as possible. Please contact me at 817/860-8147 with any questions you may have regarding this letter or the inspection plan.

Sincerely,

*/RA/*

William B. Jones, Chief  
Project Branch E  
Division of Reactor Projects

Docket: 50-397  
License: NPF-21

Enclosure:  
Columbia Generating Station  
Inspection/Activity Plan

cc w/enclosure:  
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SISP Review Completed:  \_wbj\_ ADAMS: / Yes  G No  Initials:  \_wbj\_  
 / Publicly Available  G Non-Publicly Available  G Sensitive / Non-Sensitive

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RIV:DRP/E	D:DRS	D:DRP	For signature	
WBJones;mjs	DDChamberlain	ATHowell III	WBJones	
<b>/RA/</b>	<b>/RA/</b>	<b>/RA/</b>	<b>/RA/</b>	
2/23/05	2/24/05	2/25/05	3/1/05	

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## Columbia Generating Station

## Inspection / Activity Plan

03/04/2005 - 09/30/2006

Unit Number	Inspection Activity	Title	No. of Staff on Site	Planned Dates Start	Planned Dates End	Inspection Type
	<b>OB-RTEX - RETAKE INITIAL EXAM</b>		<b>2</b>			
2	X02266	COLUMBIA (09/04) INITIAL EXAM		05/23/2005	05/27/2005	Not Applicable
	<b>PEB-52 - CGS PIR INSPECTION</b>		<b>5</b>			
2	IP 71152B	Identification and Resolution of Problems		03/14/2005	03/18/2005	Baseline Inspections
2	IP 71152B	Identification and Resolution of Problems		03/28/2005	04/15/2005	Baseline Inspections
	<b>ALARA2 - ALARA PLANNING AND CONTROLS</b>		<b>1</b>			
2	IP 7112102	ALARA Planning and Controls		04/25/2005	04/29/2005	Baseline Inspections
	<b>EB08G - ISI</b>		<b>1</b>			
2	IP 7111108G	Inservice Inspection Activities - BWR		05/09/2005	05/13/2005	Baseline Inspections
	<b>ACRSA - ACCESS CONTROL FOR RAD SIGNIFICANT AREAS</b>		<b>1</b>			
2	IP 7112101	Access Control to Radiologically Significant Areas		05/23/2005	05/27/2005	Baseline Inspections
	<b>EB21/02 - SSD&amp;PCI/50.59</b>		<b>5</b>			
2	IP 7111121	Safety System Design and Performance Capability		07/18/2005	07/22/2005	Baseline Inspections
2	IP 7111102	Evaluation of Changes, Tests, or Experiments		08/01/2005	08/05/2005	Baseline Inspections
2	IP 7111121	Safety System Design and Performance Capability		08/01/2005	08/05/2005	Baseline Inspections
	<b>RP TEAM - RADIATION SAFETY TEAM INSPECTION</b>		<b>4</b>			
2	IP 7112103	Radiation Monitoring Instrumentation and Protective Equipment		07/25/2005	07/29/2005	Baseline Inspections
2	IP 7112201	Radioactive Gaseous and Liquid Effluent Treatment and Monitoring Systems		07/25/2005	07/29/2005	Baseline Inspections
2	IP 7112202	Radioactive Material Processing and Transportation		07/25/2005	07/29/2005	Baseline Inspections
2	IP 7112203	Radiological Environmental Monitoring Program		07/25/2005	07/29/2005	Baseline Inspections
	<b>PEB-07B - HX PERFORMANCE</b>		<b>1</b>			
2	IP 7111107B	Heat Sink Performance		08/15/2005	08/19/2005	Baseline Inspections
	<b>ALARA3 - ALARA PLANNING AND CONTROLS</b>		<b>1</b>			
2	IP 7112102	ALARA Planning and Controls		08/15/2005	08/19/2005	Baseline Inspections
	<b>OB-EP2 - EMERG PREPAREDNESS PROGRAM INSPECTION</b>		<b>1</b>			
2	IP 7111402	Alert and Notification System Testing		10/31/2005	11/04/2005	Baseline Inspections
2	IP 7111403	Emergency Response Organization Augmentation Testing		10/31/2005	11/04/2005	Baseline Inspections
2	IP 7111404	Emergency Action Level and Emergency Plan Changes		10/31/2005	11/04/2005	Baseline Inspections
2	IP 7111405	Correction of Emergency Preparedness Weaknesses and Deficiencies		10/31/2005	11/04/2005	Baseline Inspections
2	IP 71151	Performance Indicator Verification		10/31/2005	11/04/2005	Baseline Inspections
	<b>PEB-05T - TRIENNIAL FIRE PROTECTION</b>		<b>4</b>			
2	IP 7111105T	Fire Protection		03/13/2006	03/17/2006	Baseline Inspections
2	IP 7111105T	Fire Protection		03/27/2006	03/31/2006	Baseline Inspections
	<b>ACRSA - ACCESS CONTROL TO RAD SIGNIFICANT AREAS</b>		<b>1</b>			
2	IP 7112101	Access Control to Radiologically Significant Areas		05/15/2006	05/19/2006	Baseline Inspections

This report does not include INPO and OUTAGE activities.  
This report shows only on-site and announced inspection procedures.

## Columbia Generating Station

## Inspection / Activity Plan

03/04/2005 - 09/30/2006

Unit Number	Inspection Activity	Title	No. of Staff on Site	Planned Dates Start	Planned Dates End	Inspection Type
	<b>ALARA1 - ALARA PLANNING AND CONTROLS</b>		<b>1</b>			
2	IP 7112102	ALARA Planning and Controls		07/10/2006	07/14/2006	Baseline Inspections
	<b>OB-INIT - COLUMBIA INITIAL EXAM</b>		<b>4</b>			
2	X02296	COLUMBIA INITIAL EXAM (09/06)		08/28/2006	09/01/2006	Not Applicable
2	X02296	COLUMBIA INITIAL EXAM (09/06)		09/18/2006	09/22/2006	Not Applicable
	<b>OB-EP EX - EMERG PREPAREDNESS EXERCISE</b>		<b>3</b>			
2	IP 7111401	Exercise Evaluation		09/11/2006	09/15/2006	Baseline Inspections
2	IP 7111404	Emergency Action Level and Emergency Plan Changes		09/11/2006	09/15/2006	Baseline Inspections
2	IP 71151	Performance Indicator Verification		09/11/2006	09/15/2006	Baseline Inspections