

UNITED STATES NUCLEAR REGULATORY COMMISSION

REGION IV 611 RYAN PLAZA DRIVE, SUITE 400 ARLINGTON, TEXAS 76011-4005

March 2, 2006

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

(NRC INSPECTION REPORT 05000397/2006001)

Dear Mr. Parrish:

On February 9, 2006, the NRC staff completed its performance review of the Columbia Generating Station. Our technical staff reviewed performance indicators for the most recent quarter and inspection results for the period from January 1 through December 31, 2005. 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.

This performance review and enclosed inspection plan do not include physical protection information. A separate letter designated and marked as "Official Use Only - Security-Related Information" will include the physical protection review and resultant inspection plan.

Overall, the 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 was within the Regulatory Response column of the NRC's Action Matrix, based on all inspection findings being classified as having very low safety significance (Green) and one White performance indicator in the Mitigating Systems Cornerstone (Safety System Unavailability, High Pressure Injection System). This performance indicator was also White in the first, second, and third quarters of the assessment period. Supplemental Inspection Procedure 95001, "Inspection for One or Two White Inputs in a Strategic Performance Area," was implemented to review the root cause, extent of cause and condition, as well as, the corrective actions associated with this White performance indicator. The results of this inspection, which was completed in October 2005, indicated that the root cause and significant contributing causes were adequately determined and appropriate corrective actions were established.

There was also a White performance indicator in the Initiating Events Cornerstone (Unplanned Scrams per 7000 Critical Hours) in the second quarter of the assessment period. On January 10, 2006, we received notification from your staff of your readiness for NRC to conduct a supplemental inspection of the actions taken in response to the Unplanned Scrams per 7000 Critical Hours performance indicator. This supplemental inspection (95001) was commenced on February 27, 2006.

In September, 2005, the NRC determined that the requirements of 10 CFR 50.73(a)(2)(v)(B) and the guidance provided in NUREG-1022, "Event Reporting Guidelines 10 CFR 50.72 and 50.73," Revision 2, had been misinterpreted by Energy Northwest. This resulted in the inappropriate reclassification of two licensee event reports associated with two loss of shutdown cooling events. These events occurred during a refueling outage in 2003. As a result of the reclassifications, the reported data for the Safety System Functional Failure Performance Indicator was revised. By revising the performance indicator data for these two events, the Safety System Functional Failure Performance Indicator data was reported as Green for the second quarter of 2004 when it should have been reported as White. While this performance indicator is currently Green, we plan to conduct a supplemental inspection (95001) beginning on March 13, 2006, to review the root cause, the extent of cause and condition, and the corrective actions for this issue.

In our midcycle assessment letter dated August 30, 2005, we advised you of the continuation of a substantive crosscutting issue in the area of human performance, which principally involved personnel errors that had consequential impacts on the plant. The annual assessment of this substantive crosscutting issue included a review of inspection results over the 12-month period of January 1 to December 31, 2005. Our assessments during the latter half of the assessment period indicate that the actions taken by Energy Northwest were effective in addressing the causes of this substantive crosscutting issue. This assessment was made on the basis of improving human performance trends and fewer NRC inspection findings, as well as program improvements, such as establishing an error review process, establishing more critical reset criteria for operations crew event free clocks, and conducting specialized human performance training. These assessment were documented in NRC Inspection Reports 05000397/2005003 and 05000397/2005005. As a result, we consider the substantive crosscutting issue closed. We will continue to monitor your progress in this area as part of the baseline inspection program.

During this assessment, the NRC identified a substantive crosscutting issue in the area of problem identification and resolution. There were four Green findings in the Mitigating Systems cornerstone that involved degraded equipment conditions in which the extent of condition was not fully addressed, indicating inadequate problem analysis. Examples include the seismic qualification impacts on 4160 volt and 480 volt switchgear, electrical breaker settings, and emergency core cooling system pump motor oil drain plugs. Although there were not a large number of these findings, all of these examples involved NRC prompting before appropriate action was initiated to evaluate the extent of condition. These inadequate problem analysis and extent of condition symptoms were also noted during our February 3, 2006, meeting with Energy Northwest on the service water pump degradation. The NRC will monitor and assess the effectiveness of your actions within this area through the implementation of the baseline inspection program, which includes our ongoing review of the degraded service water pumps identified in 2005, and the two supplemental inspections previously discussed.

The enclosed inspection plan details the inspections, except those related to physical protection, scheduled through September 30, 2007. The inspection plan is provided to allow for the resolution of any scheduling conflicts and personnel availability issues well 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.

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) component 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 Claude E. Johnson at (817) 860-8148 with any questions you may have regarding this letter or the inspection plan.

Sincerely,

/RA/

Arthur T. Howell III, Director Division of Reactor Projects

Docket: 50-397 License: NPF-21

Enclosure:

Columbia Generating Station Inspection/Activity Plan

CC:

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DRS Director (DDC)

DRS Deputy Director (RJC1)

Senior Resident Inspector (ZKD)

Branch Chief, DRP/A (CEJ1)

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- B. Benney, NRR Project Manager for CGS (BJB)

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SL	INSI Review Complet	ed:	cej ADAMS: ⊠ Yes	□ No	Initia	als:cej	
\boxtimes	Publicly Available		Non-Publicly Available	Sensitive		Non-Sensitive)

S:DRP\DRPDIR\EOC 05\Assessment Letters\CGS.wpd

RIV:C:DRP\A	D:DRS	D:DRP	RA	
CEJohnson;mjs	DDChamberlain	ATHowell III	BSMallett	
TRFarnholtz for	/RA/	/RA/	/RA/	
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Columbia Generating Station Inspection / Activity Plan 03/01/2006 - 09/30/2007

	Unit				No. of Staff	Planne		Inspection		
P 95001 Supplemental Inspection For One Or Two White Inputs In A Strategic Performance Area 0,22772006 03/03/2006 Supplemental Prograi File Protection [Triennial] 03/13/2006	Number	Inspection Acti	ivity	Title	on Site	Start	End	Туре		
		95001 - 95001 - UNPLANNED SCRAMS PI 1								
P 711110ST Five Protection [Triennial] G03/13/200 G03/17/200 Baseline Inspections G03/13/200 G03/17/200 G0	2	IP 95001		Supplemental Inspection For One Or Two White Inputs In A Strategic Performance Area		02/27/2006	03/03/2006	Supplemental Prograi		
P 71111108T Fire Protection Triennial 0327/2006 0321/2006		EB2-05T - 7	TRIENN	IIAL FIRE PROTECTION	4					
	2	IP 7111105T		Fire Protection [Triennial]		03/13/2006	03/17/2006	Baseline Inspections		
P 95001 Supplemental Inspection For One Or Two White Inputs In A Strategic Performance Area RP-ORS OCCUPATIONAL RADIATION SAFETY 1	2	IP 7111105T		Fire Protection [Triennial]		03/27/2006	03/31/2006	Baseline Inspections		
RP-ORS		95001 - 9	95001 -	SAFETY SYSTEM FUNCTION FAIL. PI	1					
P 7112101	2	IP 95001		Supplemental Inspection For One Or Two White Inputs In A Strategic Performance Area		03/13/2006	03/22/2006	Supplemental Prograi		
P 7112102		RP-ORS - 0	OCCUP	PATIONAL RADIATION SAFETY	1					
P 71151	2	IP 7112101		Access Control to Radiologically Significant Areas		04/24/2006	04/28/2006	Baseline Inspections		
RP-ORS	2	IP 7112102		ALARA Planning and Controls		04/24/2006	04/28/2006	Baseline Inspections		
2	2	IP 71151		Performance Indicator Verification		04/24/2006	04/28/2006	Baseline Inspections		
		RP-ORS - 0	OCCUP	PATIONAL RADIATION SAFETY	1					
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BRQ SIM	2	IP 7112102		ALARA Planning and Controls		08/21/2006	08/25/2006	Baseline Inspections		
2	2	IP 71151		Performance Indicator Verification		08/21/2006	08/25/2006	Baseline Inspections		
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2 IP 7111401 Exercise Evaluation 09/11/2006 09/15/2006 Baseline Inspections 2 IP 7111104 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 EB2-12B • MAINTENANCE RULE BIENNIAL 3 2 IP 71111112B Maintenance Effectiveness 10/16/2006 10/20/2006 Baseline Inspections OB-RQ • COLUMBIA REQUALIFICATION INSP 4 10/30/2006 11/03/2006 Baseline Inspections OB-INIT • COLUMBIA INITIAL EXAM 4 10/23/2006 10/23/2006 Not Applicable 2 X02296 COLUMBIA INITIAL EXAM (09/06) 10/23/2006 10/27/2006 Not Applicable 2 X02296 COLUMBIA INITIAL EXAM (09/06) 11/27/2006 11/27/2006 Not Applicable EB1-2/17 • PERMANENT MODS/50.59 3 2 IP 7111117B Permanent Plant Modifications 11/13/2006 11/17/2006 Baseline Inspections 2 IP 71111117B Permanent Plant Modifications 02/26/200	2	IP 7111111B		Licensed Operator Requalification Program		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 EB2-12B - MAINTENANCE RULE BIENNIAL 3 10/16/2006 10/20/2006 Baseline Inspections OB-RQ - COLUMBIA REQUALIFICATION INSP 4 4 10/30/2006 11/03/2006 Baseline Inspections OB-INIT - COLUMBIA INITIAL EXAM 4 10/23/2006 11/03/2006 Baseline Inspections 2 NO2296 COLUMBIA INITIAL EXAM (09/06) 10/23/2006 10/27/2006 Not Applicable 2 X02296 COLUMBIA INITIAL EXAM (09/06) 11/27/2006 12/08/2006 Not Applicable EB1-2/17 - PERMANENT MODS/50.59 3 11/13/2006 11/17/2006 Baseline Inspections 2 IP 7111117B Permanent Plant Modifications 11/13/2006 11/17/2006 Baseline Inspections 2 IP 7111117B Permanent Plant Modifications 11/13/2006 11/17/2006 Baseline Ins		OB-EP EX - I	EMERG	PREPAREDNESS EXERCISE	4					
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2 IP 71152B Identification and Resolution of Problems 02/26/2007 03/02/2007 Baseline Inspections	2	IP 7111117B		Permanent Plant Modifications		11/13/2006	11/17/2006	Baseline Inspections		
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2 IP 71152B Identification and Resolution of Problems 03/12/2007 03/16/2007 Baseline Inspections	2	IP 71152B		Identification and Resolution of Problems		03/12/2007	03/16/2007	Baseline Inspections		

This report does not include INPO and OUTAGE activities.

This report shows only on-site and announced inspection procedures.

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Columbia Generating Station Inspection / Activity Plan 03/01/2006 - 09/30/2007

Unit			No. of Staff	Planned	d Dates	Inspection
Number	Inspection Activity	Title	on Site	Start	End	Туре
	RP-ORS - OCCUP	PATIONAL RADIATION SAFETY	1			
2	IP 7112101	Access Control to Radiologically Significant Areas		04/30/2007	05/04/2007	Baseline Inspections
2	IP 7112102	ALARA Planning and Controls		04/30/2007	05/04/2007	Baseline Inspections
2	IP 71151	Performance Indicator Verification		04/30/2007	05/04/2007	Baseline Inspections
	EB1-08G - ISI		1			
2	IP 7111108G	Inservice Inspection Activities - BWR		05/21/2007	05/25/2007	Baseline Inspections
	EB1-21 - CDB		7			
2	IP 7111121	Component Design Bases Inspection		07/09/2007	07/13/2007	Baseline Inspections
2	IP 7111121	Component Design Bases Inspection		07/23/2007	08/03/2007	Baseline Inspections
	RP TEAM - RADIA	TION SAFETY TEAM	5			
2	IP 7112103	Radiation Monitoring Instrumentation and Protective Equipment		07/23/2007	07/27/2007	Baseline Inspections
2	IP 7112201	Radioactive Gaseous and Liquid Effluent Treatment and Monitoring Systems		07/23/2007	07/27/2007	Baseline Inspections
2	IP 7112202	Radioactive Material Processing and Transportation		07/23/2007	07/27/2007	Baseline Inspections
2	IP 7112203	Radiological Environmental Monitoring Program (REMP) And Radioactive Material Control $\text{Pr}\iota$		07/23/2007	07/27/2007	Baseline Inspections