



**UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-4005**

March 3, 2004

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 REPORT 05000397/2004001)**

Dear Mr. Parrish:

On February 3, 2004, 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 all technical divisions in evaluating performance indicators (PIs) for the most recent quarter and inspection results for the period from January 1 through December 31, 2003. 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.

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 baseline inspections and Temporary Instruction 2515/154, "Spent Fuel Material Control and Accounting at Nuclear Power Plants," at your facility through September 30, 2005.

Additionally, the staff has identified a substantive crosscutting issue in the area of problem identification and resolution. Problem identification and resolution issues contributed to a number of Green findings identified in the mitigating systems, barrier integrity, and occupational radiation safety cornerstones. Findings were identified involving the identification and resolution of issues regarding design issues as well as the determining the extent of condition and assuring timely corrective actions. The causal relationship of problem identification and resolution findings was a lack of rigor with regard to aggressively identifying and correcting problems with plant design information. In addition, there were degraded equipment conditions identified by your staff during this assessment period where the extent of condition was not always fully addressed that involved inadequate root cause and poor problem analysis.

The staff noted that plant personnel from several organizations (i.e., system engineering, design engineering, licensing, regulatory compliance, operations, training, and maintenance)

had failed to identify many conditions adverse to quality and take prompt corrective actions to correct the issues. As a result, there was a loss of a significant amount of design bases and design requirements information because of incorrect and inconsistent information being included in the collection of design documents and, in some cases, being incorporated into the plant (e.g., minimum flow for the recombiners and stroke time for the standby gas treatment system valves). The staff also identified that extent of condition was not always fully addressed for equipment problems as noted for the truck-operated cell switch failures. In addition, there was an example of a long-standing degraded condition involving an emergency diesel generator that involved inadequate root cause analysis. In response to this substantive crosscutting issue, the NRC will monitor the effectiveness of your actions within this area through implementation of the baseline inspection program.

In our end-of-cycle letter dated March 4, 2003, and in our midcycle letter dated August 27, 2003, we advised you of a substantive crosscutting issue in the area of human performance. In the midcycle letter we indicated the human performance crosscutting issue would remain open to allow the NRC to assess the effectiveness of your corrective actions during the 2003 refueling outage. We noted that the actions you implemented to reduce human performance errors have been effective, as evidenced by the reduction in the number of human performance errors during the refueling outage. In addition, the staff noted that the causal links that were identified in the substantive human performance crosscutting issue were not evident during the 2003 refueling outage. This issue has been satisfactorily addressed and the NRC plans no further focused inspections for the human performance crosscutting issue.

As you are aware, the NRC has issued several Orders and threat advisories to enhance security capabilities and improve guard force readiness since the terrorist attacks on September 11, 2001. We have conducted inspections to review your implementation of these requirements and have monitored your actions in response to changing threat conditions. For calendar year 2004, we plan to continue inspections of Order implementation combined with newly developed portions of the security baseline inspection program. The enclosed inspection plan details the inspections scheduled through September 30, 2005. The inspection plan is provided to minimize the resource impact on your 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 12 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) 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 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:
Rodney Webring (Mail Drop PE04)
Vice President, Nuclear Generation
Energy Northwest
P.O. Box 968
Richland, WA 99352-0968

Albert E. Mouncer (Mail Drop PE01)
Vice President, Corporate Services/
General Counsel/CFO
Energy Northwest
P.O. Box 968
Richland, WA 99352-0968

Chairman
Energy Facility Site Evaluation Council
P.O. Box 43172
Olympia, WA 98504-3172

Douglas W. Coleman (Mail Drop PE20)
Manager, Performance Assessment
and Regulatory Programs
Energy Northwest
P.O. Box 968
Richland, WA 99352-0968

Christina L. Perino (Mail Drop PE20)
Manager, Licensing
Energy Northwest
P.O. Box 968

Energy Northwest

-4-

Richland, WA 99352-0968

Max Benitz, Chairman
Benton County Board of Commissioners
P.O. Box 190
Prosser, WA 99350-0190

Dale K. Atkinson (Mail Drop PE08)
Vice President, Technical Services
Energy Northwest
P.O. Box 968
Richland, WA 99352-0968

Thomas C. Poindexter, Esq.
Winston & Strawn
1400 L Street, N.W.
Washington, DC 20005-3502

Bob Nichols
Executive Policy Division
Office of the Governor
P.O. Box 43113
Olympia, WA 98504-3113

Lynn Albin, Radiation Physicist
Washington State Department of Health
P.O. Box 47827
Olympia, WA 98504-7827

Gary Robertson, Director
Division of Radiation Protection
Department of Health
P.O. Box 47827
Olympia, WA 98504-7827

Neva J. Cockrum, Chair
Board of Franklin County Commissioners
1016 North 4th Street
Pasco, WA 99301

Federal Emergency Management Agency
Federal Regional Center
Mr. John Pennington, Regional Director
Region X
130 228th Street, SW
Bothell, WA 98021-9796

Lynn Albin, Radiation Physicist
Washington State Dept. of Health
P.O. Box 47827
Olympia, WA 98504-7827

The Honorable James R. Beaver
Mayor of Kennewick
City Hall
210 West 6th Avenue
Kennewick, WA 99336

Gary Crutchfield
Pasco City Manager
P.O. Box 293
Pasco, WA 99301

John C. Darrington Manager,
City of Richland
City Hall, 505 Swift Boulevard
Richland, WA 99352

Rick Dodson, Environmental Health
Benton-Franklin Co. Health District
800 West Canal Drive
Kennewick, WA 99336

The Honorable Michael Garrison
Mayor of Pasco
P.O. Box 293
Pasco, WA 99301-293

Dr. Larry Jecha
Benton-Franklin Co. Health District
Environmental Health
471 Williams Street
Richland, WA 99352

Mike Wilson, Project Manager
Nuclear Waste Programs
Department of Ecology
1315 West 4th Avenue
Kennewick, WA 99336-6018

The Honorable Jerry Peltier
Mayor of West Richland
City Hall
3801 West Van Giesen
West Richland, WA 99352

Energy Northwest

-6-

The Honorable Rob Welch
Mayor, City of Richland
City Hall, 505 Swift Boulevard
Richland, WA 99352

Glen Woodbury, Director
WA State Emergency Management
Military Department
Building 20 (MS TA-20)
Camp Murray, WA 98430-5122

Institute of Nuclear Power Operations (INPO)
700 Galleria Parkway SE, Suite 100
Atlanta, GA 30339

Electronic distribution by RIV:

Regional Administrator (**BSM1**)

DRP Director (**ATH**)

DRS Director (**DDC**)

Senior Resident Inspector (**GDR**)

Branch Chief, DRP/E (**WBJ**)

Senior Project Engineer, DRP/E (**VGG**)

Staff Chief, DRP/TSS (**PHH**)

RITS Coordinator (**NBH**)

RidsNrrDipmlipb

V. Dricks, PAO (**VLD**)

W. A. Maier, RSLO (**WAM**)

C. J. Gordon (**CJG**)

DRS Branch Chiefs (**LJS, TWP, ATG, CSM**)

W. D. Travers, EDO (**WDT**)

S. A. Richards, Chief, NRR/DIPM/IIPB (**SAR**)

R. K. Frahm, PPR Program Manager, NRR/DIPM/IIPB (**RKF**)

J. W. Craig, Associate Dir. for Inspection and Programs (**JWC1**)

B. W. Sheron, Associate Dir. for Project Licensing and Technical Analysis (**BWS**)

T. A. Bergman, Chief, Regional Operations Staff, OEDO (**TAB**)

H. N. Berkow, NRR Project Director (**HNB**)

S. Dembek, Chief, Section 2, NRR/DLPM (**SXD**)

B. Benney, NRR Project Manager (**BJB**)

ADAMS: Yes No Initials: __wbj__

Publicly Available Non-Publicly Available Sensitive Non-Sensitive

S:\DRP\DRPDIR\EOC for 03\Assessment Letters\COL.wpd

RIV:C:DRP/E	D:DRS	D:DRP	For signature	
WBJones;df	DDChamberlain	ATHowell	WBJones	
/RA/	/RA/	/RA/	/RA/	
2/22/04	2/26/04	2/29/04	3/2/04	

OFFICIAL RECORD COPY

T=Telephone

E=E-mail

F=Fax

Columbia Generating Station

Inspection / Activity Plan

03/01/2004 - 10/01/2005

Unit Number	Inspection Activity	Title	No. of Staff on Site	Planned Dates Start	Planned Dates End	Inspection Type
	OB-IN EX	- OB-INITIAL EXAMINATION	7			
2	X02266	COLUMBIA (09/04) INITIAL EXAM		08/23/2004	08/27/2004	Not Applicable
2	X02266	COLUMBIA (09/04) INITIAL EXAM		09/20/2004	11/15/2004	Not Applicable
	TI-154	- TI-154 MCA AT NUCLEAR PLANTS	1			
2	IP 2515/154	Spent Fuel Material Control and Accounting at Nuclear Power Plants		03/01/2004	03/31/2004	Safety Issues
	ACCESSPI	- ACRSA/PIV	1			
2	IP 7112101	Access Control to Radiologically Significant Areas		04/12/2004	04/16/2004	Baseline Inspections
	ALARA1	- ALARA PLANNING AND CONTROLS	1			
2	IP 7112102	ALARA Planning and Controls		05/17/2004	05/21/2004	Baseline Inspections
	PSB-S1	- AA-FF-AC-PI	2			
2	IP 7113001	Access Authorization		06/21/2004	06/25/2004	Baseline Inspections
2	IP 7113002	Access Control		06/21/2004	06/25/2004	Baseline Inspections
2	IP 7113008	Fitness For Duty Program		06/21/2004	06/25/2004	Baseline Inspections
2	IP 71151	Performance Indicator Verification		06/21/2004	06/25/2004	Baseline Inspections
	OB-EP2	- EP EXERCISE	3			
2	IP 7111401	Exercise Evaluation		08/30/2004	09/03/2004	Baseline Inspections
2	IP 7111404	Emergency Action Level and Emergency Plan Changes		08/30/2004	09/03/2004	Baseline Inspections
2	IP 71151	Performance Indicator Verification		08/30/2004	09/03/2004	Baseline Inspections
	EB-17B	- PERMANENT PLANT MODS	2			
2	IP 7111117B	Permanent Plant Modifications		11/15/2004	11/19/2004	Baseline Inspections
	REQUAL	- OB-REQUALIFICATION	3			
2	IP 7111111B	Licensed Operator Requalification Program		11/29/2004	12/03/2004	Baseline Inspections
	PEB-12B	- MAINTENANCE EFFECTIVENESS	1			
2	IP 7111112B	Maintenance Effectiveness		12/06/2004	12/10/2004	Baseline Inspections
	PEB-52	- CGS PIR INSPECTION	2			
2	IP 71152B	Identification and Resolution of Problems		04/04/2005	04/08/2005	Baseline Inspections
2	IP 71152B	Identification and Resolution of Problems		04/18/2005	04/22/2005	Baseline Inspections
	EB08G	- ISI	1			
2	IP 7111108G	Inservice Inspection Activities - BWR		05/02/2005	05/06/2005	Baseline Inspections
	ACRSA	- ACCESS CONTROL FOR RAD SIGNIFICANT AREAS	1			
2	IP 7112101	Access Control to Radiologically Significant Areas		05/23/2005	05/27/2005	Baseline Inspections
	EB21/02	- SSD&PCI/50.59	6			
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

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

03/01/2004 - 10/01/2005

Unit Number	Inspection Activity	Title	No. of Staff on Site	Planned Dates		Inspection Type
				Start	End	
	EB21/02 - SSD&PCI/50.59		6			
2	IP 7111121	Safety System Design and Performance Capability		08/01/2005	08/05/2005	Baseline Inspections
	RP TEAM - RADIATION SAFETY TEAM INSPECTION		4			
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
	PEB-07B - HX PERFORMANCE		1			
2	IP 7111107B	Heat Sink Performance		08/15/2005	08/19/2005	Baseline Inspections
	ALARA2 - ALARA PLANNING AND CONTROLS		1			
2	IP 7112102	ALARA Planning and Controls		08/15/2005	08/19/2005	Baseline Inspections

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