

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

August 25, 2005

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

SUBJECT: COLUMBIA GENERATING STATION - NRC RADIATION SAFETY TEAM INSPECTION REPORT 05000397/2005011

Dear Mr. Parrish:

On July 28, 2005, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at your Columbia Generating Station. The enclosed inspection report documents the inspection findings which were discussed with Mr. Dale Atkinson, Vice President, Nuclear Generation and other members of your staff.

The inspection examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. The team reviewed selected procedures and records, observed activities, and interviewed personnel. Specifically, the team evaluated the inspection areas within the Radiation Protection Strategic Performance Area that are scheduled for review every two years. These areas are:

- Radiation Monitoring Instrumentation
- Radioactive Gaseous and Liquid Effluent Treatment and Monitoring Systems
- Radioactive Material Processing and Transportation
- Radiological Environmental Monitoring Program and Radioactive Material Control
 Program

Based on the results of this inspection, no findings of significance were identified.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response (if any) 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).

Sincerely,

//RA//

Michael P. Shannon, Chief Plant Support Branch Division of Reactor Safety Energy Northwest

Docket: 50-397 License: NPF-21

Enclosure: NRC Inspection Report 05000397/2005011

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 SISP Review Completed:
 Yes
 ADAMS:
 Yes
 Initials:
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U.S. NUCLEAR REGULATORY COMMISSION REGION IV

Dockets:	50-397
Licenses:	NPF-21
Report:	05000397/2005011
Licensee:	Energy Northwest
Facility:	Columbia Generating Station
Location:	Richland, Washington
Dates:	July 26 - 28, 2005
Inspectors:	Louis C. Carson II, Senior Health Physicist, Plant Support Branch Larry T. Ricketson, P.E., Senior Health Physicist, Plant Support Branch Daniel R. Carter, Health Physicist, Plant Support Branch Gilbert L. Guerra, Health Physicist, Plant Support Branch Donald L. Stearns, Health Physicist, Plant Support Branch Binesh K. Tharakan, Health Physicist, Plant Support Branch
Approved By:	Michael P. Shannon, Chief, Plant Support Branch Division of Reactor Safety

SUMMARY OF FINDINGS

Columbia Generating Station NRC Inspection Report 05000397/2005011

IR 05000397/2005011; July 26-28, 2005; Columbia Generating Station; Radiation Safety Team

The report covered a three-day period of inspection by a team of six region-based health physics inspectors. No findings of significance were identified. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 3, dated July 2000.

REPORT DETAILS

2. RADIATION SAFETY

Cornerstone: Occupational Radiation Safety [OS]

2OS3 Radiation Monitoring Instrumentation and Protective Equipment (71121.03)

a. Inspection Scope

This area was inspected to determine the accuracy and operability of radiation monitoring instruments that are used for the protection of occupational workers and the adequacy of the program to provide self-contained breathing apparatus (SCBA) to workers. The team used the requirements in 10 CFR Part 20 and the licensee's procedures required by technical specifications as criteria for determining compliance. The team interviewed licensee personnel and reviewed:

- Calibration of area radiation monitors associated with transient high and very high radiation areas and post-accident monitors used for remote emergency assessment
- Calibration of portable radiation detection instrumentation, electronic alarming dosimetry, and continuous air monitors used for job coverage
- Calibration of whole body counting equipment and radiation detection instruments utilized for personnel and material release from the radiologically controlled area
- Self-assessments and audits
- Corrective action program reports since the last inspection
- Licensee action in cases of repetitive deficiencies or significant individual deficiencies
- Calibration expiration and source response check currency on radiation detection instruments staged for use
- The licensee's capability for refilling and transporting SCBA air bottles to and from the control room and operations support center during emergency conditions, status of SCBA staged and ready for use in the plant and associated surveillance records, and personnel qualification and training
- Qualification documentation for onsite personnel designated to perform maintenance on the vendor-designated vital components, and the vital component maintenance records for SCBA units

Either because the conditions did not exist or an event had not occurred, no opportunities were available to review the following item:

Enclosure

Licensee Event Reports

The inspector completed 9 of the required 9 samples.

b. Findings

No findings of significance were identified.

2. RADIATION SAFETY

Cornerstone: Public Radiation Safety [PS]

2PS1 Radioactive Gaseous And Liquid Effluent Treatment And Monitoring Systems (71122.01)

a. Inspection Scope

This area was inspected to ensure that the gaseous and liquid effluent processing systems are maintained so that radiological releases are properly mitigated, monitored, and evaluated with respect to public exposure. The team used the requirements in 10 CFR Part 20, 10 CFR Part 50 Appendices A and I, the Offsite Dose Calculation Manual, and the licensee's procedures required by technical specifications as criteria for determining compliance. The team interviewed licensee personnel and reviewed the following items:

- The most current radiological effluent release reports, changes to radiation monitor setpoint calculation methodology, anomalous sampling results, effluent radiological occurrence performance indicator incidents, self-assessments, audits, and licensee event reports
- Gaseous and liquid release system component configurations
- Routine processing, sample collection, sample analysis; radioactive liquid and gaseous effluent release permits and dose projections to members of the public
- Changes made by the licensee to the Offsite Dose Calculation Manual, the liquid or gaseous radioactive waste system design, procedures, or operation since the last inspection
- Monthly, quarterly, and annual dose calculations
- Surveillance test results involving air cleaning systems and stack or vent flow rates
- Instrument calibrations of discharge effluent radiation monitors and flow measurement devices, effluent monitoring system modifications, effluent radiation monitor alarm setpoint values, and counting room instrumentation calibration and quality control

- Interlaboratory comparison program results
- Audits, self-assessments and corrective action reports performed since the last inspection

Either because the conditions did not exist or an event had not occurred, no opportunities were available to review the following items:

- Changes to radiation monitor setpoint calculation methodology, anomalous sampling results, effluent radiological occurrence performance indicator incidents, and licensee event reports
- Release of radioactive liquid effluents
- Abnormal releases
- Licensee event reports and special reports since the last inspection

The inspector completed 10 of the required 10 samples.

b. Findings

No findings of significance were identified.

2PS2 Radioactive Material Processing and Transportation (71122.02)

a. Inspection Scope

This area was inspected to verify that the licensee's radioactive material processing and transportation program complies with the requirements of 10 CFR Parts 20, 61, and 71 and Department of Transportation regulations contained in 49 CFR Parts 171-180. The team interviewed licensee personnel and reviewed:

- The radioactive waste system description, recent radiological effluent release reports, and the scope of the licensee's audit program
- Liquid and solid radioactive waste processing systems configurations, the status and control of any radioactive waste process equipment that is not operational or is abandoned in place, changes made to the radioactive waste processing systems since the last inspection, and current processes for transferring radioactive waste resin and sludge discharges
- Radio-chemical sample analysis results for radioactive waste streams and use of scaling factors and calculations to account for difficult-to-measure radionuclides

- Shipment packaging, surveying, labeling, marking, placarding, vehicle checking, driver instructing, and disposal manifesting
- Shipping records for non-excepted package shipments
- Audits, state agency reports, self-assessments and corrective action reports performed since the last inspection

Either because the conditions did not exist or an event had not occurred, no opportunities were available to review the following items:

• Licensee event reports and special reports

The inspector completed 6 of the required 6 samples.

b. Findings

No findings of significance were identified.

2PS3 <u>Radiological Environmental Monitoring Program (REMP) And Radioactive Material Control</u> <u>Program (71122.03)</u>

a. Inspection Scope

This area was inspected to ensure that the REMP verifies the impact of radioactive effluent releases to the environment and sufficiently validates the integrity of the radioactive gaseous and liquid effluent release program; and that the licensee's surveys and controls are adequate to prevent the inadvertent release of licensed materials into the public domain. The team used the requirements in 10 CFR Part 20, Appendix I of 10 CFR Part 50, the Offsite Dose Calculation Manual, and the licensee's procedures required by technical specifications as criteria for determining compliance. The team interviewed licensee personnel and reviewed:

- Annual environmental monitoring reports
- Selected air sampling and thermoluminescence dosimeter monitoring stations
- Operability, calibration, and maintenance of meteorological instruments
- Each event documented in the Annual Environmental Monitoring Report which involved a missed sample, inoperable sampler, lost thermoluminescence dosimeter, or anomalous measurement
- Significant changes made by the licensee to the Offsite Dose Calculation Manual as the result of changes to the land census or sampler station modifications since the last inspection

Enclosure

- Calibration and maintenance records for air samplers, composite water samplers, and environmental sample radiation measurement instrumentation, quality control program, interlaboratory comparison program results, and vendor audits
- Locations where the licensee monitors potentially contaminated material leaving the radiological controlled area and the methods used for control, survey, and release from these areas
- Type of radiation monitoring instrumentation used to monitor items released, survey and release criteria of potentially contaminated material, radiation detection sensitivities, procedural guidance, and material release records
- Audits, self-assessments, and corrective action reports performed since the last inspection

Either because the conditions did not exist or an event had not occurred, no opportunities were available to review the following items:

- Collection and preparation of environmental samples
- Licensee event reports and special reports

The inspector completed 10 of the required 10 samples.

b. Findings

No findings of significance were identified.

4. OTHER ACTIVITIES

4OA2 Problem Identification and Resolution

a. Inspection Scope

The team evaluated the effectiveness of the licensee's problem identification and resolution process with respect to the following inspection areas:

- Radiation Monitoring Instrumentation (Section 20S3)
- Radioactive Gaseous and Liquid Effluent Treatment and Monitoring Systems
 (Section 2PS1)
- Radioactive Material Processing and Transportation (Section 2PS2)
- Radiological Environmental Monitoring Program and Radioactive Material Control Program (Section 2PS3)
- a. <u>Findings and Observations</u>

No findings of significance were identified.

4OA6 Management Meetings

Exit Meeting Summary

On July 28, 2005, the team presented the inspection results to Mr. D. Atkinson, Vice President, Nuclear Generation and other members of the staff who acknowledged the findings. The team confirmed that proprietary information was not provided or examined during the inspection.

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee

- J. Allen, Supervisor, Radiological Support
- D. Atkinson, Vice President, Nuclear Generation
- D. Bennett, Supervisor, Chemistry
- I. Borland, Manager, Radiological Services
- D. Coleman, Manager, Performance Assessment and Regulatory Programs
- D. Kania, Senior Radwaste and Transportation Specialist, Chemistry
- M. Laudisio, Radiological Operations Supervisor, Radiation Protection
- T. Lynch, Plant General Manager
- L. Schleder, Environmental Scientist II, Environmental Services
- R. Schott, Senior Radwaste and Transportation Specialist, Chemistry
- C. Sly, Licensing Engineer
- T. Southworth, Environmental Scientist II, Environmental Services
- K. Webb, Health Physicist, Radiation Protection
- J. Weers, Engineer, Systems Engineering

NRC Personnel

- Z. Dunham, Senior Resident Inspector
- R. Cohen, Resident Inspector

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Items Opened, Closed, and Discussed During this Inspection

Opened

None

Opened and Closed

None

<u>Closed</u>

None

Discussed

None

LIST OF DOCUMENTS REVIEWED

Section 2OS3: Radiation Monitoring Instrumentation and Protective Equipment (71121.03)

Instrument Procedures

Instrument Pr	ocedures
10.24.148	PM CAL/TEST - RADECO Model H-809V High Volume Air Samples, Revision 9
10.24.154	PM CAL/TEST - High Volume Air Samples, Revision 11
10.24.167	PM CAL/TEST - Eberline Model AMS-3 Beta Air Monitor, Revision 7
10.24.176	PM CAL/TEST - Eberline Model RAS-1 Continuous Air Sampler, Revision 7
10.24.181	PM CAL/TEST - RADECO Model H-809C High Volume Air Samples, Revision 7
10.24.204	PM CAL/TEST - RADECO Model H-809B2 High Volume Air Samples, Revision 3
10.24.205	PM CAL/TEST - Telescopic Air Samplers, RADECO HD-29A and HI-Q MRV-14C Samples, Revision 4
11.2.4.5	Whole Body Counts and Daily Checks Using the Renaissance Fastscan,
11.2.4.5	Revision 8
11.2.9.4	Eberline Model RO-2/RO-2A & Bicron RSO-5/RSO-50, Revision 11
11.2.9.26	Eberline Model ASP-1, Revision 4
11.2.9.33	Ludlum Model 14C, Revision 1
11.2.10.10	Operation & Functional Check of the Nuclear Enterprises Installed Personnel
	Monitor (IPM) and CM 7A Contamination Monitor, Revision 9
11.2.13.8	Surveys, Revision 6
12.1.1	Laboratory Quality Assurance, Revision 14
12.8.7	Chemistry Ortec Gamma Ray Analyzer System, Revision 12
12.13.20	In Plant Air Particulate Monitor Calibration, Revision 9
13.9.1	Environmental Field Monitoring Operations, Revision 36
HPI 0.16	Radiation Protection Portable Instrument Use & Calibration Guidelines, Revision 2
HPI 5.6	Calibration of the Renaissance Fastscan Whole Body Counting System, Revision 3
HPI 7.1	Operation and Calibration of Shepard Panoramic Irradiator, Revision 8
HPI 7.2	Operation and Calibration of Shepard Panoramic Neutron Irradiator, Revision 7
HPI 7.5	Eberline Model RO-2 Calibration, Revision
HPI 7.9	Eberline Model 6112B Teletector Calibration, Revision 7
HPI 7.18	Operation and Calibration of Shepard Series 28 Calibrator, Revision 8
HPI 7.19	Operation and Calibration of Eberline Model 1000 Multi Source Gamma Calibrator,
1111110	Revision 6
HPI 7.52	Ludlum Model 14C Geiger Counter Calibration With 44-6 GM Detector, Revision 1
HPI 7.53	Operation and Characterization of Merlin Gerin (MG) CDM Calibrator and
	Calibration of the DMC 100/200 Electronic Dosimeters, Revision 8
HPI 12.61	Use of SAM-9 Small Article Monitor, Revision 8
SLI 24-6	Calibration of RADECO Model HD-28 and HD-29 and SAIC Model AVS-28A,
	Revision 7
SOP 11.09	REMP Air Sample Distribution, Collection and Shipping, Revision 1
ISP-X302	WOA/PRM-Control Room Vent Radiation Monitor W.ARIS-31B, Revision 5

<u>Condition Reports /Problem Evaluation Request</u> CR 2-05-04101, CR 2-05-06075, CR 2-05-06082, CR 2-05-06128 Audit and Assessments Fire Protection Program (AU-FP-04) Fire Protection Program (AU-FP-05) Fire Protection Engineering Evaluation - Fire Brigade SCBA Breathing Air, 8/7/03 Self Assessment SA-2003-0056 Self Assessment SA-2005-0046 Quality Services Audit Report AU-CH-04: Chemistry Environmental and Effluents Monitoring Programs

Calibration Records

RADECO Air Sampler No. 1113; April 27, 2005 RADECO Air Sampler No. 1114; April 27, 2005 Fastscan Calibration DIC 1515.2; June 20, 2005 SAIC Air Flow Sampler AVS-28A, No. 0060953-70; January 24, 2005 SAIC Air Flow Sampler AVS-28A, No. 0060966-79; July 24, 2005 SW-RITS-605; March 24, 2005 OG-RIS-601B; February 9, 2005 CC/RC AR-RITS-21; April 19, 2005

Surveillance Procedures

6.PRM. 302	Off-Gas Radiation Monitor Linearity Test and Efficiency Determination, Revision 6
6 PRM. 312	Reactor Building Kaman Monitor Channel Functional Test, Revision 5
6.PRM. 331	SW Radiation Monitor - A Calibration Check and Instrument Channel Test
	Revision 4
6.PRM. 332	SW Radiation Monitor - B Calibration Check and Instrument Channel Test
	Revision 5

Section 2PS1: Radioactive Gaseous and Liquid Effluent Treatment and Monitoring Systems

Procedures

1100000000	
MSP-WMA-B102	Control Room Div-B Filtration System HEPA Filter Test, Rev. 4
MSP-WMA-B103	Control Room Div-A Filtration System - Carbon Adsorber Test, Rev. 4
MSP-SGT-B104	Standby Gas Treatment System Unit B - Carbon Adsorber Test, Rev. 4
MSP-SGT-B103	Standby Gas Treatment System Unit A - Carbon Adsorber Test, Rev. 4
MSP-SGT-B101	Standby Gas Treatment System Unit A HEPA Filter Test, Rev. 3
12.1.1	Laboratory Quality Assurance, Rev. 14
12.8.7	Chemistry-ORTEC Gamma-Ray Analyzer System, Rev. 12
HPI 15.1	Inspection and Storage of Respirators and Attachments, Rev. 6
GEN-RPP-10	Use of Respiratory Protection Equipment, Rev. 3
GEN-RPP-05	Respiratory Protection Program Description, Rev. 5
10.2.62	Breathing Air Compressor Operation, Rev. 9
	- · · ·

Condition Reports/Problem Evaluation Requests

PER 204-0609; PER 204-1245; PER 204-0566; PER 203-4244; PER 205-0297 CR 2-04-00051; CR 2-05-04466; CR 2-04-03640; CR 2-04-03616; CR 2-04-07069 CR 2-04-06142

<u>Audits</u>

Integrated Performance Assessment Report (July 1 through October 31,2003) Chemistry Environmental and Effluents Monitoring Programs (AU-CH-04)

Effluent Sample Reports

WEA-SR-25 Noble Gas Sample Report 7/14/05 PRM Particulate Filter and Iodine Cartridge Report 7/12/05 PRM-CAB-2 Noble Gas Sample Report 7/14/05 PRM Particulate Filter and Iodine Cartridge Report 7/20/05 RRA-RITS-3 Filter Sample Report 7/21/05 WEA(c) Particulate Filter and Iodine Cartridge Report 7/19/05 WEA(b) Particulate Filter and Iodine Cartridge Report 7/19/05 WEA(a) Particulate Filter and Iodine Cartridge Report 7/19/05 TEA(R) Particulate Filter and Iodine Cartridge Report 7/19/05 TEA(L) Particulate Filter and Iodine Cartridge Report 7/19/05 Monthly Gas Grab Sample Report 7/13/05 Weekly Iodine, Particulate, and Tritium Report 7/13/05

<u>Miscellaneous</u>

Columbia Generating Station Offsite Dose Calculation Manual, Amendment No. 44, May 2005 2003 Annual Radioactive Effluent Release Report 2004 Annual Radioactive Effluent Release Report Results of Radiochemistry Cross Check Program - First Quarter 2003

Monthly Dose Data for 2004

Offsite Dose Calculation Manual, "31 Day Dose Calculation," for the following months: 12/31/03, 12/8/04, 2/26/04, 4/1/04, 5/5/04, 6/2/04, 7/7/04, 8/4/04, 9/1/04, 10/6/04, 11/3/04, 12/1/04, 1/5/05

Section 2PS2: Radioactive Material Processing and Transportation

Condition Reports /Problem Evaluation Request

PER 203-3512, PER 204-1135, PER 205-0230 CR 2-04-00148, CR 2-04-00927, CR 2-04-02458, CR 2-04-3276, CR 2-05-01477, CR 2-05-02425, CR 2-05-02458, CR 2-05-03483, CR 2-05-04198, CR 2-05-05242, CR 2-05-05901, CR 2-05-06124

Procedures **Procedures**

1.11.12	Removal of Liquids from the RCA, Revision 10
2.11.1	Solid Waste Processing System, Revision 21
11.2.23.1	Shipping Radioactive Materials and Waste, Revision 4
11.2.23.3	Manual Radioactive Waste and Material Characterization, Revision 12
11.2.23.14	Sampling of Radioactive Waste Streams, Revision 10

SWP-RMP-02Radioactive Waste Process Control Program, Revision 3SWP-RMP-03Hazardous Materials Transportation Security Plan, Revision 0

Audits, Assessments, and Surveys

Audit Report: AU-RW-04, Process Control Program, March 15, 2004 Self Assessment Number SA-2004-0082, Rad Waste Regulation Changes Energy Northwest Survey of Pacific Ecosolutions Report, No. 04-CG-01, July 15, 2004

Shipment Packages 03-56, 04-01, 04-21, 05-04, 05-22, 05-46, 05-49

<u>Section 2PS3: Radiological Environmental Monitoring Program (REMP) And Radioactive</u> Material Control Program

Audits and Assessments Audit Report: AU-CH-04 Chemistry Environmental and Effluent Monitoring Programs

Condition Reports /Problem Evaluation Request

CR 2-04-00914, CR 2-04-01141, CR 2-04-02314, CR 2-04-02577, CR 2-04-04907, CR 2-04-06423, CR 2-05-03043, CR 2-05-04648

Procedures

1.11.1	Radiological Environmental Monitoring Program (REMP) Implementation
	Procedure, Revision 9
1.11.12	Removal of Liquids from the RCA, Revision 10
11.2.15.7	Release of Material from Radiologically Controlled Areas, Revision 14
RCP-MET-S301	Wind Speed/Direction Channel Calibration 33' and 245', Revision 10
RCP-MET-S302	Meteorology Temperature Monitoring Instrumentation Channel Calibration,
	Revision 13
SOP11.01	Milk Sampling for REMP, Revision 2
SOP 11.09	REMP Air Sample Distribution, Collection, and Shipping, Revision 1
SOP 11.10	Environmental TLD Locations, Revision 1
SOP 12.04.	Radiological Environmental Monitoring Program Quality Assurance and
	Quality Control, Revision 0

Annual Reports

2003 and 2004 Annual Radiological Environmental Operating Report

Calibration Records

Air sampler 0060954, 0060956, 0060965 Meteorological monitoring instrumentation-temperature (3/25/05) Meteorological monitoring instrumentation-wind speed/direction (4/02/05)