ENERGY NORTHWEST

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Docket No. 50-397

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

Gentlemen:

Subject: **COLUMBIA GENERATING STATION, OPERATING LICENSE NPF-21 INITIAL SUBMITTAL OF INDIVIDUAL PLANT EXAMINATION FOR EXTERNAL EVENTS (IPEEE) STATUS OF IMPROVEMENTS**

Reference: Letter, dated June 26, 1995, JV Parrish (Energy Northwest) to NRC, "Initial Submittal of Individual Plant Examination for External Events (IPEEE) (TAC NO. 74489)"

The reference submittal included Section 7.0, Plant Improvements and Unique Safety Features. This section identified potential improvements and anticipated actions as a result of the IPEEE study.

The disposition of each proposed improvement is provided in the attachment. If you have any questions regarding the improvements, please call PJ Inserra at (509) 377-4147.

Respectfully,

Paul Inserra
FOR
DW Coleman
Manager, Regulatory Affairs
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Attachment

cc: EW Merschoff - NRC RIV
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A011

INITIAL SUBMITTAL OF INDIVIDUAL PLANT EXAMINATION FOR EXTERNAL EVENTS (IPEEE)

STATUS OF IMPROVEMENTS COLUMBIA GENERATING STATION

Improvement 1

Walkdown Findings - During the seismic walkdown of E-SM-7 and E-SM-7/75/2, the connection between these cabinets was found to be less than expected. Rather than being connected at the edges, as is usually the case, these cabinets were connected at the center of the adjoining panel. This left the cabinets susceptible to banging during a seismic event. Subsequent analysis showed that banging induced relay chatter did not impact safety functions during a seismic event. Nonetheless, these cabinets will be edge connected the next time such activities can be safely performed. (Pages 7.0-1 and 2)

Status

The initial submittal of the Individual Plant Examination for External Events (IPEEE) is in error regarding this improvement. The action identified as Improvement 1, above, regarding connection of cabinets E-SM-7 and E-SM-7/75/2 was not completed. The safety related switchgear cabinets are seismically qualified and the above action was considered an additional assurance but not necessary. An engineering evaluation concluded that no further actions are warranted since the seismic requirements are maintained.

Improvement 2

Walkdown Findings - Three motor control centers (MCC) and two instrument racks important to safety were found to have hangers in close enough proximity to question the affect that seismic induced banging might have on operability during an earthquake. All five situations were found to be operable for all safety related functions. Nonetheless, each of these potential hanging situations will be remedied via normal plant processes. (Page 7.0-2)

Status

The initial submittal of the IPEEE implied an action would be taken. This finding was subsequently reviewed and an engineering evaluation concluded that no further action was warranted since the seismic requirements are maintained. The safety related MCCs and instrument racks are seismically qualified and the above action was considered an additional assurance but not necessary.

Improvement 3

FP Diesel Engine Batteries - During the walkdown for seismic-fire interactions, it was noted that while the diesel powered fire pump installed at WNP-2 was very ruggedly mounted, the batteries were not tied down. Thus, while the pump, controls, engine, and fuel storage tank would remain intact for any probable seismic event, the diesel engine may not start because the batteries could topple. This pump is not required to withstand earthquake events per the WNP-2 license. Actions are being taken as good business practice to tie down the batteries for the diesel powered fire pump. (Page 7.0-2)

Status

COMPLETE. This improvement was completed in July 1995 when straps were added across the previously installed Plexiglas covers on each battery to aid in holding the battery in place should a seismic event occur.

Improvement 4

MCC Base Connections - The major contributing sequences to seismic risk at WNP-2 involve failure of MCC base connections. These cabinets currently meet design basis requirements and do not pose an undue safety hazard. However, it is recommended that the costs and benefits of increasing the seismic capability of these cabinets be explored. (Page 7.0-2)

Status

COMPLETE. A cost-benefit analysis was completed in April 1996 and concluded that it was not cost-beneficial to pursue a design change modification to increase the seismic capacity of MCC's 7F and 8F.

Improvement 5

Transient Combustible Limits - In general, combustible loadings in critical plant areas are low and are installed or constructed in a manner that make fire propagation improbable. However, several areas (most notably the cable spreading room and cable chase area) are very sensitive to transient combustible loadings. It is recommended that existing procedures for control of transient combustibles in these areas be reviewed for adequacy. (Page 7.0-2)

Status

COMPLETE. A procedure (PPM 1.3.10) was revised to address additional transient combustible loading in the cable spreading room and cable chase areas.

Improvement 6

Alternate Switchgear Room Cooling - One of the most important functions impacted by MCC failure in very large seismic events is room cooling to the critical switchgear rooms. It is recommended that the costs and benefits of providing procedural direction for opening the doors to a critical switchgear room be explored as an alternate means of providing adequate cooling to the area. (Page 7.0-3)

Status

A cost-benefit analysis of providing procedural direction for an alternate means of providing adequate cooling to switchgear rooms was not performed. It was subsequently determined that existing annunicator response procedures were adequate.

Improvement 7

Critical AC Bus Alternate Power - The recovery of the critical AC Buses SM-7 and SM-8 was shown to be significant in reducing induced CDF. This recovery action is proceduralized and due to its importance it is recommended that specific training scenarios be included in the operator training program. (Page 7.0-3)

Status

COMPLETE. This improvement is complete. Training was provided as part of electrical distribution requalification training I 1995 and was reviewed in licensed operator requalification update training in 1996.