

March 28, 2002  
GO2-02-055

Docket No. 50-397

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

Gentlemen:

Subject: **COLUMBIA GENERATING STATION, OPERATING LICENSE NPF-21,  
SUPPLEMENT TO TECHNICAL SPECIFICATION AMENDMENT  
REQUEST TO TECHNICAL SPECIFICATION SURVEILLANCE  
REQUIREMENT 3.6.1.3.6**

Reference: Letter dated March 22, 2002, GO Smith (Energy Northwest) to NRC, "Columbia  
Generating Station, Operating License NPF-21, Technical Specification  
Amendment Request To Technical Specification Surveillance Requirement  
3.6.1.3.6"

This letter is written to supplement the referenced license amendment request regarding a primary  
containment isolation valve surveillance requirement. This supplement provides clarification  
regarding the exigent nature of the request.

On March 21, 2002 Columbia Generating Station requested enforcement discretion from  
compliance with Required Action A of Limiting Condition for Operation (LCO) 3.6.1.3  
because two inboard main steam isolation valves (MSIVs) were declared inoperable due to  
failure to meet Surveillance Requirement (SR) 3.6.1.3.6. Compliance with the LCO action  
would have required isolation of two main steam lines necessitating a plant shutdown.  
Enforcement discretion was granted in order to minimize the potential safety consequences and  
operational risks associated with an unnecessary plant transient.

The current situation could not be predicted or avoided. The surveillance requirement for MSIVs  
was previously thought to be met and each MSIV operable. The discovery that circuit response  
time should not be included in MSIV isolation time, regarding the three-second time limit portion  
of SR 3.6.1.3.6, resulted in two MSIVs being technically inoperable.

Pool

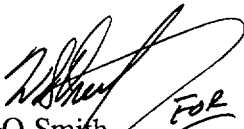
**SUPPLEMENT TO TECHNICAL SPECIFICATION AMENDMENT REQUEST TO  
TECHNICAL SPECIFICATION SURVEILLANCE REQUIREMENT 3.6.1.3.6**

Page 2

Approval of this exigent Technical Specification amendment request will preclude the need for continued enforcement discretion. The proposed exigent license amendment to SR 3.6.1.3.6 is requested to remain in effect until startup from the R-16 refueling outage, or until startup from a forced outage of sufficient duration (greater than 72 hours) to perform surveillance testing to meet the requirements of SR 3.6.1.3.6 as it is currently written.

Should you have any questions or desire additional information regarding this matter, please call Ms. CL Perino at (509) 377-2075.

Respectfully,



GO Smith

Vice President, Generation  
Mail Drop PE04

cc: EW Merschoff - NRC-RIV  
JB Hickman - NRC-NRR  
NRC Sr. Resident Inspector - 988C  
DL Williams - BPA/MD1399  
TC Poindexter - Winston & Strawn  
JO Luce - ESFEC