

ENERGY NORTHWEST

P.O. Box 968 ■ Richland, Washington 99352-0968

April 19, 2002
GO2-02-066

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
REQUEST FOR AMENDMENT TECHNICAL SPECIFICATION 5.5.10,
TECHNICAL SPECIFICATION (TS) BASES CONTROL PROGRAM**

**Reference: Letter GO2-01-044, dated March 19, 2001, DW Coleman (Energy Northwest),
to NRC, "Implementation of Revised 10 CFR 50.59"**

Energy Northwest hereby submits a request for amendment to Columbia Generating Station Operating License NPF-21. This request is made in accordance with Title 10 of the Code of Federal Regulations (CFR), Parts 50.90 and 50.92. The proposed change revises Technical Specification (TS) 5.5.10, "Technical Specification (TS) Bases Control Program," to provide consistency with changes to 10 CFR 50.59 as published in the Federal Register (64FR53582) dated October 4, 1999, that became effective March 13, 2001.

The proposed changes to TS 5.5.10 are made to incorporate the change made in 10 CFR 50.59 to remove the phrase "unreviewed safety question." The proposed changes to TS 5.5.10 are consistent with NRC approved Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler TSTF-364, Revision 0, as amended by Westinghouse Owners' Group (WOG) editorial change WOG-ED-24.

The description of the proposed change is provided in Attachment 1. The determination that the proposed amendment warrants no significant hazards consideration is provided in Attachment 2. The environmental assessment applicability review is provided in Attachment 3. The marked-up copy of the affected TS page is provided in Attachment 4. The typed version of the TS page as proposed by this amendment is provided in Attachment 5.

A001

REQUEST FOR AMENDMENT TECHNICAL SPECIFICATION 5.5.10, TECHNICAL SPECIFICATION (TS) BASES CONTROL PROGRAM

Page 2

This amendment request has been reviewed by the Columbia Generating Station Plant Operations Committee and Energy Northwest Corporate Nuclear Safety Review Board. In accordance with 10 CFR 50.91, the state of Washington has been provided a copy of this letter.

There is no specific need date for approval of this amendment. Columbia Generating Station implemented the 10 CFR 50.59 rule August 1, 2001, as stated in the referenced letter. Approval of the amendment request will make Technical Specification Section 5.5.10 consistent with the 10 CFR 50.59 rule change.

Should you have any questions or require additional information regarding this matter, please contact Ms. CL Perino, acting Licensing Manager at (509) 377-2075.

Respectfully,



RL Webring

Vice President, Operations Support/PIO
Mail Drop PE08

Attachments

cc: EW Merschoff - NRC RIV
JS Cushing - NRC NRR
NRC Sr. Resident Inspector - 988C
DL Williams - BPA/1399
TC Poindexter - Winston & Strawn
JO Luce - EFSEC

REQUEST FOR AMENDMENT TECHNICAL SPECIFICATION 5.5.10, TECHNICAL SPECIFICATION (TS) BASES CONTROL PROGRAM

Attachment 1

Page 1 of 2

DESCRIPTION OF PROPOSED CHANGE

Proposed Change

This amendment application will revise Administrative Controls Technical Specification Section 5.5.10, "Technical Specification (TS) Bases Control Program" subsections 5.5.10.b and 5.5.10.b.2, to provide consistency with the change in Title 10 of the Code of Federal Regulations (CFR) Part 50.59. The change regarding 10 CFR 50.59 is consistent with the NRC approved Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler TSTF-364, Revision 0, as amended by Westinghouse Owners' Group (WOG) editorial change WOG-ED-24. The 10 CFR 50.59 changes were published in the Federal Register (64FR53582) on October 4, 1999 and became effective on March 13, 2001. Specifically, the proposed change to TS 5.5.10.b will replace the word "involve" with "require" (WOG-ED-24). The proposed change to TS 5.5.10.b.2 will replace, "A change to the FSAR or Bases that involves an unreviewed safety question as defined in 10 CFR 50.59" to read, "A change to the updated FSAR or Bases that requires NRC approval pursuant to 10 CFR 50.59" (INSERT from TSTF-364).

Discussion

Title 10 of the Code of Federal Regulations (10 CFR) Part 50.59 establishes the conditions under which licensees may make changes to the facility or procedures and conduct tests or experiments without prior NRC approval.

In 1999, the NRC revised its regulation (64 Fed Reg. 53582 [October 4, 1999]) regarding changes, tests and experiments performed by the nuclear plant licensees. The changes to the rule clarified the specific types of changes, tests and experiments conducted at a licensed facility that require evaluation, and revised the criteria that licensees must use to determine when NRC approval is needed before such changes, tests or experiments can be implemented. The final rule also added definitions for terms that have been subject to differing interpretations, and reorganizes the rule language for clarity. Proposed changes, tests and experiments that satisfy the definitions and one or more of the criteria in the rule must be reviewed and approved by the NRC before implementation.

The present TS Bases Control Program required by TS 5.5.10 allows the licensee to make changes to the TS Bases without NRC approval provided the changes do not involve a change in the TS incorporated in the license, or a change to the FSAR or Bases that involves an "unreviewed safety question" as defined in 10 CFR 50.59. With the revisions to 10 CFR 50.59, the definition of "unreviewed safety question" was eliminated. Therefore, the TS should be revised consistent with the revision to 10 CFR 50.59.

REQUEST FOR AMENDMENT TECHNICAL SPECIFICATION 5.5.10, TECHNICAL SPECIFICATION (TS) BASES CONTROL PROGRAM

Attachment 1

Page 2 of 2

The Commission's Final Rule, effective March 13, 2001, on the revision of 10 CFR 50.59 affects the working of the "Technical Specification Bases Control Program." In that revision, the Commission removed the term "unreviewed safety question." This amendment will remove this phrase from the TS, while retaining the citation of 10 CFR 50.59. The revised 10 CFR 50.59 continues to provide appropriate and adequate control of changes to the TS Bases.

REQUEST FOR AMENDMENT TECHNICAL SPECIFICATION 5.5.10, TECHNICAL SPECIFICATION (TS) BASES CONTROL PROGRAM

Attachment 2

Page 1 of 2

EVALUATION OF SIGNIFICANT HAZARDS CONSIDERATIONS

Summary of Proposed Change

The proposed change revises TS 5.5.10, "Technical Specification (TS) Bases Control Program," to provide consistency with changes to 10 CFR 50.59 as published in the Federal Register (64FR53582) dated October 4, 1999. The change regarding 10 CFR 50.59 is consistent with the NRC approved Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler TSTF-364, Revision 0, as amended by Westinghouse Owners' Group (WOG) editorial change WOG-ED-24. Specifically, the proposed change to TS 5.5.10.b will replace the word "involve" with "require" (WOG-ED-24). The proposed change to TS 5.5.10.b.2 will replace, "A change to the FSAR or Bases that involves an unreviewed safety question as defined in 10 CFR 50.59" to read, "A change to the updated FSAR or Bases that requires NRC approval pursuant to 10 CFR 50.59" (INSERT from TSTF-364).

No Significant Hazards Consideration Determination

Pursuant to 10 CFR 50.92, it has been determined that this request involves no significant hazards. The determination of no significant hazards was made by applying the NRC established standards contained in 10 CFR 50.92. These standards assure that any changes to the operation of the plant in accordance with this request, consider the following:

- 1) Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?

The proposed change deletes the reference to "unreviewed safety question" as defined in 10 CFR 50.59. Deletion of the definition of "unreviewed safety question" was approved by the NRC with the revision of 10 CFR 50.59. This change is administrative in nature. Consequently, the probability of an accident previously evaluated is not significantly increased. Changes to the TS Bases are still evaluated in accordance with 10 CFR 50.59. As a result, the probability or consequences of any accident previously evaluated are not significantly affected. There is no increase in the radiological dose at the site boundary for any previously evaluated accident. Therefore, this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

- 2) Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?

The proposed change does not involve a physical alteration of the plant (i.e., no new or different type of equipment will be installed) or a change in the methods governing normal plant operation. These changes are considered administrative in nature and do not modify, add, delete, or relocate any technical requirements in the TS. Therefore,

REQUEST FOR AMENDMENT TECHNICAL SPECIFICATION 5.5.10, TECHNICAL SPECIFICATION (TS) BASES CONTROL PROGRAM

Attachment 2

Page 2 of 2

this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3) Does the change involve a significant reduction in a margin of safety?

The proposed changes will not reduce a margin of safety because it has no direct effect on any safety analyses assumptions. Changes to the TS Bases that result in meeting the criteria in paragraph 10 CFR 50.59(c)(2) continue to require NRC approval pursuant to 10 CFR 50.59. This change is administrative in nature based on the revision to 10 CFR 50.59. Therefore, the proposed change does not involve a significant reduction in the margin of safety.

Based on the above evaluations, Energy Northwest concludes that the activities associated with the proposed changes represent no significant hazards under the standards set forth in 10 CFR 50.92, and accordingly, a finding by the NRC of no significant hazard consideration is justified.

REQUEST FOR AMENDMENT TECHNICAL SPECIFICATION 5.5.10, TECHNICAL SPECIFICATION (TS) BASES CONTROL PROGRAM

Attachment 3

Page 1 of 1

ENVIRONMENTAL ASSESSMENT APPLICABILITY REVIEW

Energy Northwest has reviewed this request and determined that the proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10)(ii). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment needs to be prepared in connection with the issuance of the amendment. The change meets the eligibility criteria for categorical exclusion set forth in 10 CFR Section 51.22(c)(10)(ii) since the proposed change only effects record keeping, reporting, or administrative procedures or requirements.

Based on the considerations discussed above: 1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, 2) such activities will be conducted in compliance with regulations, and 3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

REQUEST FOR AMENDMENT TECHNICAL SPECIFICATION 5.5.10, TECHNICAL SPECIFICATION (TS) BASES CONTROL PROGRAM

Attachment 4

Page 1 of 1

Marked-Up Technical Specification Page

5.5 Programs and Manuals

5.5.10 Technical Specifications (TS) Bases Control Program (continued)

b. Licensees may make changes to Bases without prior NRC approval provided the changes do not ~~involve~~ ^{require} either of the following:

1. A change in the TS incorporated in the license; or

2. ^{updated} A change to the FSAR or Bases that involves an ~~unreviewed safety question as defined in 10 CFR 50.59.~~

c. The Bases Control Program shall contain provisions to ensure that the Bases are maintained consistent with the FSAR.

d. Proposed changes that meet the criteria of 5.5.10.b above shall be reviewed and approved by the NRC prior to implementation. Changes to the Bases implemented without prior NRC approval shall be provided to the NRC on a frequency consistent with 10 CFR 50.71(e). ^{that requires NRC approval pursuant to}

5.5.11 Safety Function Determination Program (SFDP)

This program ensures loss of safety function is detected and appropriate actions taken. Upon entry into LCO 3.0.6, an evaluation shall be made to determine if loss of safety function exists. Additionally, other appropriate limitations and remedial or compensatory actions may be identified to be taken as a result of the support system inoperability and corresponding exception to entering supported system Condition and Required Actions. This program implements the requirements of LCO 3.0.6.

a. The SFDP shall contain the following:

1. Provisions for cross division checks to ensure a loss of the capability to perform the safety function assumed in the accident analysis does not go undetected;

2. Provisions for ensuring the plant is maintained in a safe condition if a loss of function condition exists;

(continued)

REQUEST FOR AMENDMENT TECHNICAL SPECIFICATION 5.5.10, TECHNICAL SPECIFICATION (TS) BASES CONTROL PROGRAM

Attachment 5

Page 1 of 1

Typed Version of Technical Specification Page

5.5 Programs and Manuals (continued)

5.5.9 Diesel Fuel Oil Testing Program

A diesel fuel oil testing program shall establish the required testing of both new fuel oil and stored fuel oil. The program shall include sampling and testing requirements, and acceptance criteria, all in accordance with applicable ASTM Standards. The purpose of the program is to establish the following:

- a. Acceptability of new fuel oil for use prior to addition to storage tanks by determining that the fuel oil has:
 1. An API gravity, a specific gravity, or an absolute specific gravity within limits,
 2. A kinematic viscosity, if gravity was not determined by comparison with the supplier's certificate, and a flash point within limits for ASTM 2-D fuel oil,
 3. A water and sediment content within limits or a clear and bright appearance with proper color;
- b. Other properties for ASTM 2-D fuel oil are within limits within 31 days following sampling and addition to storage tanks; and
- c. Total particulate concentration of the fuel oil in the storage tanks is ≤ 10 mg/l when tested every 31 days in accordance with ASTM D-2276, Method A-2 or A-3.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Diesel Fuel Oil Testing Program test Frequencies.

5.5.10 Technical Specifications (TS) Bases Control Program

This program provides a means for processing changes to the Bases to these Technical Specifications.

- a. Changes to the Bases of the TS shall be made under appropriate administrative controls and reviews.

(continued)