

May 8, 2002  
GO2-02-082

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  
LICENSE AMENDMENT REQUEST - ALTERNATIVE SOURCE TERM**

Reference: Letter GO2-01-156, dated December 3, 2001, RL Webring (Energy Northwest) to  
NRC, "License Amendment Request – Alternative Source Term"

Energy Northwest recently submitted (see Reference) a request for amendment to the Columbia Generating Station Operating License to revise our licensing and design bases to reflect application of alternative source term methodology. Revision of our licensing bases will resolve a longstanding Justification for Continued Operation regarding the establishment of secondary containment vacuum under adverse environmental conditions. It will also allow us to deactivate (and subsequently remove) the Main Steam Leakage Control (MSLC) System. Recently the NRC has indicated that approval of the request for amendment, with issuance of a safety evaluation report, should not be expected until November 2002.

Columbia Generating Station would like to communicate our need for approval of this amendment request by November 2002. With the next refueling outage for Columbia Generating Station scheduled to begin in May 2003, approval of the alternative source term request for amendment by November 2002 will contribute to a successful refueling outage. With approval of the alternative source term amendment request by November, Columbia Generating Station will have less restrictive local leak rate testing acceptance criteria, less restrictions on fuel movement due to deletion of secondary containment integrity applicability, and less surveillance testing and maintenance of motor operated valves and excess flow check valves. Approval of the amendment request by November 2002 will provide an opportunity to make all necessary procedure and scheduling changes required to implement the amendment prior to commencement of the refueling outage. Lastly, Columbia Generating Station did not request an extension of an MSLC System surveillance from 18 to 24 months in anticipation of approval of our amendment request prior to our next refueling outage. Testing to meet this surveillance can only be performed during cold shutdown conditions, and the current surveillance would expire prior to the refueling outage requiring a plant shutdown.

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If there is anything we can do to assist the NRC in their review of our amendment request, please do not hesitate to call me or Ms CL Perino at (509) 377-2075.

Respectfully,



DW Coleman, Manager  
Performance Assessment and Regulatory Programs  
Mail Drop PE20

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