

**ENERGY  
NORTHWEST**

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

July 18, 2002  
GO2-02-114

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555-0001

Gentlemen:

Subject: **COLUMBIA GENERATING STATION  
DOCKET NO. 50-397  
APPLICATION FOR TECHNICAL SPECIFICATION CHANGE  
REGARDING MISSED SURVEILLANCES USING THE  
CONSOLIDATED LINE ITEM IMPROVEMENT PROCESS**

In accordance with the provisions of 10 CFR 50.90, Energy Northwest is submitting a request for an amendment to the technical specifications (TS) for Columbia Generating Station.

The proposed amendment would modify TS requirements for missed surveillances in SR 3.0.3.

Attachment 1 provides a description of the proposed change, the requested confirmation of applicability, and plant-specific verifications. Attachment 2 provides the existing TS pages marked up to show the proposed change. Attachment 3 provides revised (clean) TS pages. Attachment 4 provides a summary of the regulatory commitments made in this submittal. Attachment 5 provides the existing TS Bases pages marked up to show the proposed change (for information only).

Energy Northwest requests approval of the proposed License Amendment by October 31, 2002, with the amendment being implemented within 60 days following approval.

In accordance with 10 CFR 50.91, a copy of this application, with attachments, is being provided to the designated Washington State Official.

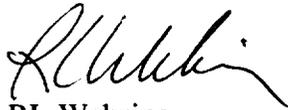
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**APPLICATION FOR TECHNICAL SPECIFICATION CHANGE REGARDING  
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IMPROVEMENT PROCESS (CLIP)**

Page 2

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

Sincerely,



RL Webring  
Vice President, Operations Support/PIO  
Mail Drop PE08

Attachments

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

STATE OF WASHINGTON )  
 )  
COUNTY OF BENTON )

Subject: Application for TS Change  
on Missed Surveillances  
(CLIP)

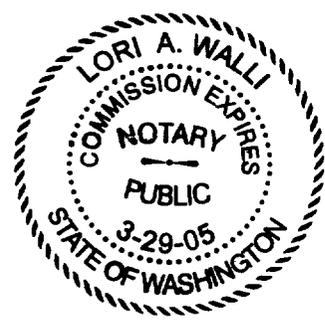
I, R. L. WEBRING, being duly sworn, subscribe to and say that I am the Vice President, Operations Support/PIO for ENERGY NORTHWEST, the applicant herein; that I have the full authority to execute this oath; that I have reviewed the foregoing; and that to the best of my knowledge, information, and belief the statements made in it are true.

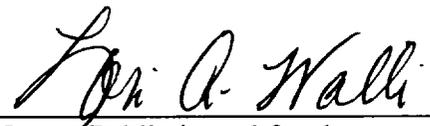
DATE 7/18/02, 2002

  
\_\_\_\_\_  
R. L. Webring  
Vice President, Operations Support/PIO

On this date personally appeared before me R. L. WEBRING, to me known to be the individual who executed the foregoing instrument, and acknowledged that he signed the same as his free act and deed for the uses and purposes herein mentioned.

GIVEN under my hand and seal this 18<sup>th</sup> day of July, 2002.



  
\_\_\_\_\_  
Notary Public in and for the  
STATE OF WASHINGTON

Residing at Benton County

My Commission Expires 3-29-05

# **APPLICATION FOR TECHNICAL SPECIFICATION CHANGE REGARDING MISSED SURVEILLANCES USING THE CONSOLIDATED LINE ITEM IMPROVEMENT PROCESS (CLIIP)**

## **Attachment 1**

**Page 1 of 2**

### **1.0 DESCRIPTION**

The proposed amendment would modify technical specification (TS) requirements for missed surveillances in surveillance requirement (SR) 3.0.3.

The changes are consistent with Nuclear Regulatory Commission (NRC) approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification (STS) change TSTF-358, Revision 6. TSTF-358, Revision 6, incorporates the modifications made to TSTF-358, Revision 5, as a result of Federal Register Notice (66 FR 32400), dated June 14, 2001, and in response to public comments. The availability of this TS improvement was published in the Federal Register on September 28, 2001, (66 FR 49714) as part of the consolidated line item improvement process (CLIIP).

### **2.0 ASSESSMENT**

#### **2.1 Applicability of Published Safety Evaluation**

Columbia Generating Station has reviewed the safety evaluation dated June 14, 2001, as modified in response to the comments noticed on September 28, 2001, as part of the CLIIP. This review included a review of the NRC staff's evaluation, as well as the supporting information provided to support TSTF-358. Columbia Generating Station has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to and justify this amendment for the incorporation of the changes to the Columbia Generating Station TS.

#### **2.2 Optional Changes and Variations**

Columbia Generating Station is not proposing any variations or deviations from the TS changes described in TSTF-358, Revision 6, or the NRC staff's model safety evaluation dated June 14, 2001, as modified in response to the comments noticed on September 28, 2001.

### **3.0 REGULATORY ANALYSIS**

#### **3.1 No Significant Hazards Consideration Determination**

Energy Northwest has reviewed the proposed no significant hazards consideration determination (NSHCD) published in the Federal Register (66 FR 32400) as part of the CLIIP. Energy Northwest has concluded that the proposed NSHCD presented in the Federal Register notice is applicable to Columbia Generating Station and is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

# **APPLICATION FOR TECHNICAL SPECIFICATION CHANGE REGARDING MISSED SURVEILLANCES USING THE CONSOLIDATED LINE ITEM IMPROVEMENT PROCESS (CLIP)**

**Attachment 1**

**Page 2 of 2**

## **3.2 Verification and Commitments**

As discussed in the notice of availability published in the Federal Register on September 28, 2001, for this TS improvement, plant-specific verifications were performed as follows:

Energy Northwest has established TS Bases for SR 3.0.3 which state that use of the delay period established by SR 3.0.3 is a flexibility which is not intended to be used as an operational convenience to extend surveillance intervals, but only for the performance of missed surveillances.

The modification will also include changes to the Bases for SR 3.0.3 that provide details on how to implement the new requirements. The Bases changes provide guidance for surveillance frequencies that are not based on time intervals but are based on specified unit conditions, operating situations, or requirements of regulations. In addition, the Bases changes state that Columbia Generating Station is expected to perform a missed surveillance test at the first reasonable opportunity, taking into account appropriate considerations, such as the impact on plant risk and accident analysis assumptions, consideration of unit conditions, planning, availability of personnel, and the time required to perform the surveillance. The Bases also state that the risk impact should be managed through the program in place to implement 10 CFR 50.65(a)(4) and its implementation guidance, NRC Regulatory Guide 1.182, "Assessing and Managing Risks Before Maintenance Activities at Nuclear Power Plants," and that the missed surveillance should be treated as an emergent condition, as discussed in Regulatory Guide 1.182. In addition, the Bases state that the degree of depth and rigor of the evaluation should be commensurate with the importance of the component and that missed surveillances for important components should be analyzed quantitatively. The Bases also state that the results of the risk evaluation determine the safest course of action. In addition, the Bases state that all missed surveillances will be placed in the licensee's Corrective Action Program. Finally, Columbia Generating Station has a Bases Control Program consistent with Section 5.5 of the STS.

## **4.0 ENVIRONMENTAL EVALUATION**

Energy Northwest has reviewed the environmental consideration included in the model safety evaluation dated June 14, 2001, as part of the CLIP. Energy Northwest has concluded that the staff's findings presented in that evaluation are applicable to Columbia Generating Station and the evaluation is hereby incorporated by reference for this application.

**APPLICATION FOR TECHNICAL SPECIFICATION CHANGE REGARDING  
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**Attachment 2**

**Page 1**

**PROPOSED TECHNICAL SPECIFICATION CHANGES (MARK-UP)**

### 3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

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SR 3.0.1 SRs shall be met during the MODES or other specified conditions in the Applicability for individual LCOs, unless otherwise stated in the SR. Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO. Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO except as provided in SR 3.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.

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SR 3.0.2 The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met.

For Frequencies specified as "once," the above interval extension does not apply.

If a Completion Time requires periodic performance on a "once per . . ." basis, the above Frequency extension applies to each performance after the initial performance.

Exceptions to this Specification are stated in the individual Specifications.

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SR 3.0.3 If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is less. This delay period is permitted to allow performance of the greater Surveillance.

Insert 1

If the Surveillance is not performed within the delay period, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

When the Surveillance is performed within the delay period and the Surveillance is not met, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

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(continued)

**TS Insert**

**Insert 1**

A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.

**APPLICATION FOR TECHNICAL SPECIFICATION CHANGE REGARDING  
MISSED SURVEILLANCES USING THE CONSOLIDATED LINE ITEM  
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**Attachment 3**

**Page 1**

**PROPOSED TECHNICAL SPECIFICATION PAGES (CLEAN)**

3.0 LCO APPLICABILITY (continued)

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LCO 3.0.7

Special Operations LCOs in Section 3.10 allow specified Technical Specifications (TS) requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other TS requirements remain unchanged. Compliance with Special Operations LCOs is optional. When a Special Operations LCO is desired to be met but is not met, the ACTIONS of the Special Operations LCO shall be met. When a Special Operations LCO is not desired to be met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with the other applicable Specifications.

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### 3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

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SR 3.0.1

SRs shall be met during the MODES or other specified conditions in the Applicability for individual LCOs, unless otherwise stated in the SR. Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO. Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO except as provided in SR 3.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.

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SR 3.0.2

The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met.

For Frequencies specified as "once," the above interval extension does not apply.

If a Completion Time requires periodic performance on a "once per . . ." basis, the above Frequency extension applies to each performance after the initial performance.

Exceptions to this Specification are stated in the individual Specifications.

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SR 3.0.3

If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is greater. This delay period is permitted to allow performance of the Surveillance. A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.

If the Surveillance is not performed within the delay period, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

- (continued)

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3.0 SR APPLICABILITY

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SR 3.0.3  
(continued)            When the Surveillance is performed within the delay period and the Surveillance is not met, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

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SR 3.0.4            Entry into a MODE or other specified condition in the Applicability of an LCO shall not be made unless the LCO's Surveillances have been met within their specified Frequency. This provision shall not prevent entry into MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.

SR 3.0.4 is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, and 3.

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**APPLICATION FOR TECHNICAL SPECIFICATION CHANGE REGARDING  
MISSED SURVEILLANCES USING THE CONSOLIDATED LINE ITEM  
IMPROVEMENT PROCESS (CLIIP)**

**Attachment 4**

**Page 1 of 1**

**LIST OF REGULATORY COMMITMENTS**

The following table identifies those actions committed to by Columbia Generating Station in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments. Please direct questions regarding these commitments to Ms. CL Perino, Licensing Manager at (509) 377-2075.

<b>COMMITMENT</b>	<b>Due Date/Event</b>
Columbia Generating Station will establish the Technical Specification Bases for SR 3.0.3 as adopted with the applicable license amendment.	This change will be implemented within 60 days of amendment approval.

**APPLICATION FOR TECHNICAL SPECIFICATION CHANGE REGARDING  
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**Attachment 5**

**Page 1**

**PROPOSED TECHNICAL SPECIFICATION BASES CHANGE (MARK-UP)**

BASES

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SR 3.0.2  
(continued)

The 25% extension does not significantly degrade the reliability that results from performing the Surveillance at its specified Frequency. This is based on the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the SRs. The exceptions to SR 3.0.2 are those Surveillances for which the 25% extension of the interval specified in the Frequency does not apply. These exceptions are stated in the individual Specifications. The requirements of regulations take precedence over the TS. Therefore, when a test interval is specified in the regulations, the test interval cannot be extended by the TS, and the SR includes a Note in the Frequency stating, "SR 3.0.2 is not applicable."

As stated in SR 3.0.2, the 25% extension also does not apply to the initial portion of a periodic Completion Time that requires performance on a "once per..." basis. The 25% extension applies to each performance after the initial performance. The initial performance of the Required Action, whether it is a particular Surveillance or some other remedial action, is considered a single action with a single Completion Time. One reason for not allowing the 25% extension to this Completion Time is that such an action usually verifies that no loss of function has occurred by checking the status of redundant or diverse components or accomplishes the function of the inoperable equipment in an alternative manner.

The provisions of SR 3.0.2 are not intended to be used repeatedly merely as an operational convenience to extend Surveillance intervals (other than those consistent with refueling intervals) or periodic Completion Time intervals beyond those specified.

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SR 3.0.3

SR 3.0.3 establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a Surveillance has not been completed within the specified Frequency. A delay period of up to 24 hours or up to the limits of the specified Frequency, whichever is ~~less~~, applies from the point in time it is discovered that the Surveillance has not been performed in accordance with SR 3.0.2, and not at the time that the specified Frequency was not met. This delay period provides adequate time to complete Surveillances that

greater

(continued)

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BASES

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SR 3.0.3  
(continued)

have been missed. This delay period permits the completion of a Surveillance, or allows time to obtain a temporary waiver of the Surveillance Requirement (Ref.1), before complying with Required Actions or other remedial measures that might preclude completion of the Surveillance.

The basis for this delay period includes consideration of unit conditions, adequate planning, availability of personnel, the time required to perform the Surveillance, the safety significance of the delay in completing the required Surveillance, and the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the requirements.

Insert 1

~~When a Surveillance with a Frequency based not on time intervals, but upon specified unit conditions or operational situations, is discovered not to have been performed when specified, SR 3.0.3 allows the full delay period of 24 hours to perform the Surveillance.~~

~~SR 3.0.3 also provides a time limit for completion of Surveillances that become applicable as a consequence of MODE changes imposed by Required Actions.~~

Failure to comply with specified Frequencies for SRs is expected to be an infrequent occurrence. Use of the delay period established by SR 3.0.3 is a flexibility which is not intended to be used as an operational convenience to extend Surveillance intervals.

Insert 2

If a Surveillance is not completed within the allowed delay period, then the equipment is considered inoperable or the variable then is considered outside the specified limits and the Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon expiration of the delay period. If a Surveillance is failed within the delay period, then the equipment is inoperable, or the variable is outside the specified limits and the Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon the failure of the Surveillance.

Completion of the Surveillance within the delay period allowed by this Specification, or within the Completion Time of the ACTIONS, restores compliance with SR 3.0.1.

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(continued)

## TS Bases Insert

### Insert 1

When a Surveillance with a Frequency based not on time intervals, but upon specified unit conditions, operating situations, or requirements of regulations (e.g., prior to entering MODE 1 after each fuel loading, or in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions, etc.) is discovered to not have been performed when specified, SR 3.0.3 allows for the full delay period of up to the specified Frequency to perform the Surveillance. However, since there is not a time interval specified, the missed Surveillance should be performed at the first reasonable opportunity.

SR 3.0.3 provides a time limit for, and allowances for the performance of, Surveillances that become applicable as a consequence of MODE changes imposed by Required Actions.

### Insert 2

While up to 24 hours or the limit of the specified Frequency is provided to perform the missed Surveillance, it is expected that the missed Surveillance will be performed at the first reasonable opportunity. The determination of the first reasonable opportunity should include consideration of the impact on plant risk (from delaying the Surveillance as well as any plant configuration changes required or shutting the plant down to perform the Surveillance) and impact on any analysis assumptions, in addition to unit conditions, planning, availability of personnel, and the time required to perform the Surveillance. This risk impact should be managed through the program in place to implement 10 CFR 50.65(a)(4) and its implementation guidance, NRC Regulatory Guide 1.182, 'Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants.' This Regulatory Guide addresses consideration of temporary and aggregate risk impacts, determination of risk management action thresholds, and risk management action up to and including plant shutdown. The missed Surveillance should be treated as an emergent condition as discussed in the Regulatory Guide. The risk evaluation may use quantitative, qualitative, or blended methods. The degree of depth and rigor of the evaluation should be commensurate with the importance of the component. Missed Surveillances for important components should be analyzed quantitatively. If the results of the risk evaluation determine the risk increase is significant, this evaluation should be used to determine the safest course of action. All missed Surveillances will be placed in the licensee's Corrective Action Program.