

ENERGY NORTHWEST

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

September 10, 2002
GO2-02-145

United States Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-0001

Subject: **COLUMBIA GENERATING STATION, DOCKET NO. 50-397
COMMITMENT RELATED TO INSERVICE INSPECTION PROGRAM
PLAN RELIEF REQUEST 2ISI-25**

- References:
- 1) Letter GO2-01-149, dated November 2, 2001, RL Webring (Energy Northwest) to NRC, "Inservice Inspection Program Plan Relief Request 2ISI-25"
 - 2) Draft Regulatory Guide DG-1091 (Proposed Revision 13 of Regulatory Guide 1.147), "Inservice Inspection Code Case Acceptability, ASME Section XI, Division 1 (FRN67335, DG-1091)"

Dear Sir or Madam:

The letter in reference 1 above requested relief from the requirements imposed by ASME Section XI, IWA-7210 concerning the purchase, exchange, and transfer of materials between nuclear electric generating facilities. The letter requested NRC approval to allow Columbia Generating Station to use ASME Section XI Code Case N-528-1 in place of IWA-7210. Subsequent to submittal of this letter, the NRC published Draft Regulatory Guide DG-1091 (reference 2) for comment. This draft regulatory guide lists Code Case N-528-1 as a conditionally acceptable code case.

The condition imposed by the NRC in Draft Regulatory Guide DG-1091 concerning the application of ASME Section XI Code Case N-528-1 is as follows:

"The requirements of 10 CFR Part 21 are to be applied to the nuclear plant site supplying the material as well as to the nuclear plant site receiving the material that has been purchased, exchanged, or transferred between sites."

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The purpose of this letter is to provide a commitment that we will meet the above condition prior to implementation of ASME Section XI Code Case N-528-1.

If you have any questions or desire additional information pertaining to this letter, please call Ms. CL Perino at (509) 377-2075.

Respectfully,



DK Atkinson
Vice President, Technical Services
Mail Drop PE08

cc: EW Merschoff - NRC RIV
BJ Benney - NRC NRR
NRC Senior Resident Inspector/988C
DL Williams - BPA/1399
TC Poindexter - Winston & Strawn