

ENERGY NORTHWEST

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

October 22, 2002
GO2-02-172

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Subject: **COLUMBIA GENERATING STATION, DOCKET NO. 50-397
REQUEST FOR AMENDMENT TO OPERATING LICENSE NPF-21**

Dear Sir or Madam:

Pursuant to 10 CFR 50.90, Energy Northwest hereby requests the following amendment: Amend the Columbia Generating Station Operating License to delete the reference to Operating License Section 2.E in Operating License Section 2.F. This will eliminate a redundant reporting requirement. Energy Northwest has concluded that the proposed amendment introduces no significant hazards under the standards set forth in 10 CFR 50.92.

Energy Northwest requests approval of the proposed amendment by January 31, 2003. Once approved, the amendment shall be implemented within 60 days.

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

If you have any questions or require additional information, please contact Ms. CL Perino at (509) 377-2075.

Respectfully,



DK Atkinson
Vice President, Technical Services
Mail Drop PE08

Enclosures 1) Licensee evaluation of the proposed changes
2) Notarized affidavit

Attachment 1) Proposed Operating License Change (mark-up)

cc: EW Merschoff - NRC RIV
BJ Benney - NRC NRR
NRC Senior Resident Inspector/988C

DL Williams - BPA/1399
TC Poindexter - Winston & Strawn
JO Luce - EFSEC

A001

STATE OF WASHINGTON)
)
COUNTY OF BENTON)

Subject: Deletion of Redundant
Reporting Requirement

I, DW Coleman, being duly sworn, subscribe to and say that I am the Acting Vice President, Technical Services 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 October 22, 2002

D.W. Coleman
DW Coleman
Acting Vice President, Technical Services

On this date personally appeared before me DW Coleman, 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 22nd day of October 2002.



Lori A. Walli
Notary Public in and for the
STATE OF WASHINGTON

Residing at Benton County

My commission expires 3-29-05

**REQUEST FOR AMENDMENT
DELETION OF PHYSICAL SECURITY PROGRAM REDUNDANT REPORTING
REQUIREMENT**

Enclosure 1

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LICENSEE'S EVALUATION

SUBJECT: Deletion of Physical Security Program Redundant Reporting Requirement

DESCRIPTION

This letter is a request to amend Operating License NFP-21 for the Columbia Generating Station. The proposed Operating License amendment deletes the reference to Operating License Section 2.E in Operating License Section 2.F.

PROPOSED CHANGE

The proposed Operating License amendment deletes a reference to Operating License Section 2.E in Operating License Section 2.F. Operating License Section 2.F presently requires the Columbia Generating Station to report any violations of the requirements contained in Section 2.C (with the exception of 2.C(2)) and 2.E of the License. Operating License Section 2.E requires Columbia Generating Station to fully implement and maintain in effect all provisions of the Commission-approved physical security, guard training and qualification, and safeguards contingency plans. The requirement to report a violation of Section 2.E is redundant and unnecessary because the reporting requirements and criteria for our Physical Security Program are specified in 10 CFR 73.71 and 10 CFR 73 Appendix G.

BACKGROUND

Included in Columbia Generating Station Operating License Section 2.F is the requirement to report violations of the requirements contained in Operating License Section 2.E. Operating License Section 2.E contains requirements for implementing and maintaining the Commission-approved physical security, guard training and qualification, and safeguards contingency plans. The Physical Security Program has specific reporting requirements located in 10 CFR 73.71 and 10 CFR 73 Appendix G. Reporting per the requirement of Operating License Section 2.F is redundant, not specific to the Physical Security Program, and consequently, unnecessary. The proposed change deletes the reference to Section 2.E in Operating License Section 2.F.

TECHNICAL ANALYSIS

This is an administrative change only, and requires no supporting technical analysis. The NRC has approved an equivalent amendment request for the San Onofre Nuclear Generating Station (Reference 1).

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REGULATORY SAFETY ANALYSIS

10 CFR 50.92 Evaluation

Columbia Generating Station has evaluated whether or not a significant hazards consideration is involved with the proposed amendment by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

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

Response: No

The proposed Operating License amendment request is administrative in nature and merely deletes a duplicative and unnecessary reporting requirement. The proposed amendment deletes a reference to Operating License Section 2.E in Operating License Section 2.F. Operating License Section 2.F presently requires the Columbia Generating Station to report any violations of the requirements contained in Section 2.C (with the exception of 2.C(2)) and 2.E of the License. Operating License Section 2.E requires Columbia Generating Station to fully implement and maintain in effect all provisions of the Commission-approved physical security, guard training and qualification, and safeguards contingency plans. The requirement to report a violation of Section 2.E is redundant and unnecessary because the reporting requirements and criteria for the physical security program are specified in 10CFR73.71 and 10CFR73 Appendix G. This change to the Operating License has no impact on the manner in which the Columbia Generating Station is operated. No actual plant equipment or accident analyses will be affected by the proposed change. There will be no increase in radiological dose to plant workers or the public. Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

Response: No

The proposed Operating License amendment request is administrative in nature and merely deletes a duplicative and unnecessary reporting requirement. The proposed amendment deletes a reference to Operating License Section 2.E in Operating License Section 2.F. Operating License Section 2.F presently requires the Columbia Generating Station to report any violations of the requirements contained in Section 2.C (with the exception of 2.C(2)) and 2.E of the License. Operating License Section 2.E requires Columbia Generating Station to fully implement and maintain in effect all provisions of the Commission-approved physical security, guard training and qualification, and safeguards contingency plans. The requirement to report a violation of

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Section 2.E is redundant and unnecessary because the reporting requirements and criteria for the Physical Security Program are specified in 10 CFR 73.71 and 10 CFR 73 Appendix G. This request is administrative in nature. This change to the Operating License has no impact on the manner in which the Columbia Generating Station is operated. No actual plant equipment or accident analyses will be affected by the proposed change. No failure modes not bounded by previously evaluated accidents will be created. Therefore, the proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

Response: No

The proposed change will not reduce a margin of safety because it has no direct effect on any safety analyses assumptions, and no adverse effect on the performance of any system, structure, or component relied upon for accident mitigation. The proposed amendment deletes a reference to Operating License Section 2.E in Operating License Section 2.F. Deletion of the reference to Section 2.E eliminates a redundant and unnecessary reporting requirement, because the reporting requirements and criteria for the physical security program are specified in 10 CFR 73.71 and 10 CFR 73 Appendix G. Additionally, there would be no effect on baseline core damage probability. Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, Energy Northwest concludes that the proposed amendment presents no significant hazards consideration under the standards set forth in 10 CFR 50.92, and, accordingly, a finding of "no significant hazards consideration" is justified.

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ENVIRONMENTAL CONSIDERATION

Energy Northwest has evaluated the proposed amendment against the criteria for identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.21.

The proposed change meets the criteria for categorical exclusion as provided under 10 CFR 51.22(c)(9) because the change does not pose a significant hazards consideration nor does it involve a significant increase in the amounts, or a change in the types of any effluent that may be released off-site.

Additionally, this request does not involve a significant increase in individual or cumulative occupational radiation exposure.

REFERENCES

1. Letter from MB Fields (NRC) to HB Ray (SCE), dated December 16, 1997, "Issuance of Amendments for San Onofre Nuclear Generating Station."

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Attachment 1**

Proposed Operating License Change (mark-up)

- D. Exemptions from certain requirements of Appendices G, H and J to 10 CFR Part 50, are described in the Safety Evaluation Report. These exemptions are authorized by law and will not endanger life or property or the common defense and security and are otherwise in the public interest. Therefore, these exemptions are hereby granted pursuant to 10 CFR 50.12. With the granting of this exemption the facility will operate, to the extent authorized herein, in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission.
- E. The licensee shall fully implement and maintain in effect all provisions of the Commission-approved physical security, guard training and qualification, and safeguards contingency plans, including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The plans, which contain Safeguards Information protected under 10 CFR 73.21, are entitled: "Columbia Generating Station Physical Security Plan," with revisions submitted through July 5, 2001; "Columbia Generating Station Guard Training and Qualification Plan," with revisions submitted through July 5, 2001; and "Columbia Generating Station Safeguards Contingency Plan," with revisions submitted through July 5, 2001. Changes made in accordance with 10 CFR 73.55 shall be implemented in accordance with the schedule set forth therein.
- F. With the exception of 2.C(2) the licensee shall report any violations of the requirements contained in Section 2.C, ~~and E~~ of this license within 24 hours by telephone and confirm by telegram, mailgram, or facsimile transmission to the NRC Regional Administrator, Region V, or that administrator's designee, no later than the first working day following the violation, with a written followup report within 14 days.
- G. The licensee shall notify the Commission, as soon as possible but not later than one hour, of any accident at this facility which could result in an unplanned release of quantities of fission products in excess of allowable limits for normal operation established by the Commission.
- H. The licensee shall have and maintain financial protection of such type and in such amounts as the Commission shall require in accordance with Section 170 of the Atomic Energy Act of 1954, as amended, to cover public liability claims.