

January 9, 2003

Mr. J. V. Parrish  
Chief Executive Officer  
Energy Northwest  
P.O. Box 968 (Mail Drop 1023)  
Richland, WA 99352-0968

SUBJECT: COLUMBIA GENERATING STATION - ISSUANCE OF AMENDMENT  
RE: ADMINISTRATIVE TECHNICAL SPECIFICATION CHANGES  
(TAC NO. MB6684)

Dear Mr. Parrish:

The Commission has issued the enclosed Amendment No. 182 to Facility Operating License No. NPF-21 for the Columbia Generating Station. The amendment consists of changes to the Technical Specifications (TS) in response to your application dated October 22, 2002.

The amendment revises the administrative section of the TSs in accordance with Technical Specification Task Force, Item 258, Revision 4, "Changes to Section 5.0, Administrative Controls."

A copy of the related Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's next biweekly *Federal Register* notice.

Sincerely,

**/RA/**

Brian Benney, Project Manager, Section 2  
Project Directorate IV  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-397

Enclosures: 1. Amendment No. 182 to NPF-21  
2. Safety Evaluation

cc w/encls: See next page

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Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-397

Enclosures: 1. Amendment No. 182 to NPF-2  
2. Safety Evaluation

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ENERGY NORTHWEST

DOCKET NO. 50-397

COLUMBIA GENERATING STATION

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 182  
License No. NPF-21

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Energy Northwest (licensee) dated October 22, 2002, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and paragraph 2.C.(2) of Facility Operating License No. NPF-21 is hereby amended to read as follows:

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 182 and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. The license amendment is effective as of its date of issuance and shall be implemented within 60 days from the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

*/RA/*

Stephen Dembek, Chief, Section 2  
Project Directorate IV  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical  
Specifications

Date of Issuance: January 9, 2003

ATTACHMENT TO LICENSE AMENDMENT NO. 182

FACILITY OPERATING LICENSE NO. NPF-21

DOCKET NO. 50-397

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain vertical lines indicating the areas of change. The corresponding overleaf pages are also provided to maintain document completeness.

REMOVE

5.2-2  
5.2-3  
5.3-1  
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INSERT

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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 182 TO FACILITY OPERATING LICENSE NO. NPF-21  
ENERGY NORTHWEST  
COLUMBIA GENERATING STATION  
DOCKET NO. 50-397

1.0 INTRODUCTION

By application dated October 22, 2002, Energy Northwest (the licensee) requested changes to the Technical Specifications (TSs) (Appendix A to Facility Operating License No. NPF-21) for the Columbia Generating Station (CGS). The proposed changes would revise the administrative section of the TSs per Technical Specification Task Force (TSTF), Item 258, Revision 4, titled "Changes to Section 5.0, Administrative Controls."

2.0 REGULATORY EVALUATION

As part of a continuing effort to maintain and improve the use of TSs, the industry and the NRC staff have worked to develop generic changes to the improved Standard Technical Specifications (ISTSS) (NUREGs-1430 through 1434). This process saves licensee and industry resources by addressing generic issues once, rather than on each plant docket, and by pre-identifying the information necessary to process the change. This improves the adoption process for generically acceptable changes.

Generic changes to the ISTS NUREGs are proposed by the Nuclear Energy Institute (NEI) TSTF to the NRC. The TSTF includes representatives from the four U.S. commercial nuclear power plant owners groups and NEI. Generic changes are prepared and reviewed using a process that the TSTF and the NRC developed to correct and improve the ISTS NUREGs. These proposed changes are assigned a number for tracking purposes and are referred to as TSTFs (e.g., TSTF-2, TSTF-5, etc). After NRC approval, these TSTFs are available for adoption by plants. TSTF-258, Revision 4, "Changes to Section 5.0, Administrative Controls," has been approved by the NRC. Periodically, the NRC issues revisions to the ISTS NUREGs which incorporate the approved TSTFs. NUREG-1433, "Standard Technical Specifications, General Electric Plants, BWR/4," Revision 2, was issued April 30, 2001, and incorporates TSTF-258, Revision 4. This is the ISTS NUREG which applies to CGS.

3.0 TECHNICAL EVALUATION

The changes in TSTF-258, Revision 4 which CGS proposes to adopt are revisions to TS Section 5.0, "Administrative Controls," in five areas:

- (1) Revise TS Section 5.2.2 to delete the staffing requirements for licensed Reactor Operators (ROs) and Senior Reactor Operators (SROs), delete TS details for working hour limits, and clarify the requirements for the Shift Technical Advisor (STA) position.
- (2) Revise TS Section 5.3 to incorporate the regulatory definitions for RO and SRO positions.
- (3) Revise TS Section 5.5.4, "Radioactive Effluent Controls Program," to be consistent with the intent of Title 10 of the *Code of Federal Regulations* (10 CFR) Part 20.
- (4) Revise TS Section 5.6.4 to delete periodic reporting requirements for main steam relief valve openings.
- (5) Revise TS Section 5.7 to update radiological area control requirements for radiation areas to be consistent with 10 CFR 20.1601(c).

### 3.1 Revision of TS 5.2.2, Unit Staff

#### Description of Change and Justification:

This portion of TSTF-258, Revision 4, deletes details of staffing requirements for ROs and SROs in TS 5.2.2.b. The justification given in the NRC-approved TSTF is that the requirements of 10 CFR 50.54(m)(2)(iii) and 10 CFR 50.54(k) adequately provide for shift manning. Section 50.54(m)(2)(iii) requires, "When a nuclear power unit is in an operational mode other than cold shutdown or refueling, as defined by the unit's technical specifications, each licensee shall have a person holding a senior operator license for the nuclear power unit in the control room at all times. In addition to this senior operator, for each fueled nuclear power unit, a licensed operator or senior operator shall be present at the controls at all times." Further, 10 CFR 50.54(k) requires, "An operator or senior operator licensed pursuant to part 55 of this chapter shall be present at the controls at all times during the operation of the facility." The revised wording matches NUREG-1433, Revision 2.

Specific working hour limits in TS 5.2.2.e are revised to reference administrative procedures as the means to control working hours. The justification given in the NRC-approved TSTF is that the proposed changes will provide reasonable assurance that excessive working hours will not impair operator actions for safe plant operation. Specific working hour limits are not otherwise required to be in the TS under 10 CFR 50.36(c)(5). Specific controls for working hours of reactor plant staff are described in procedures that require a deliberate decision-making process to minimize the potential for impaired personnel performance, and the established procedure control processes will provide sufficient control for changes to that procedure. Additionally, the statement, "Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the Plant Manager or his designee to ensure that excessive hours have not been assigned" is being deleted from TS 5.2.2.e. There is no guidance in NRC Generic Letter 82-12, "Nuclear Power Plant Staff Working Hours," that discusses these additional controls. The additional requirement to have the Plant Manager (or his designee) review individual overtime on a monthly basis is unnecessary since sufficient administrative controls and policies exist in site procedures in lieu of this approval requirement, a new TS provision is being added to require a periodic independent review of overtime usage, which will ensure that the administrative procedures are being effectively implemented.



TS 5.5.2.e is renumbered to TS 5.2.2.d. The revised numbering and wording matches NUREG-1433, Revision 2.

TS 5.2.2.g is revised to eliminate the title of "Shift Technical Advisor (STA)." The justification given in the NRC-approved TSTF is that TS 5.2.2.g is revised so that it does not imply that the STA and the Shift Supervisor must be different individuals. Option 1 of the Commission Policy Statement on Engineering Expertise on Shift can be satisfied by assigning an individual with specified educational qualifications to each operating crew as one of the SROs required by 10 CFR 50.54(m)(2)(i) to provide the technical expertise on shift. The existing TS 5.2.2.g wording of, "the STA shall provide advisory technical support to the Shift Supervisor...", can be easily misinterpreted to require separate individuals. Therefore, the wording is revised so that the STA function may be provided by either a separate individual or the individual who also fulfills another role in the shift command structure. TS 5.2.2.g is renumbered to TS 5.2.2.f. The revised numbering and wording matches NUREG-1433, Revision 2.

Applicability to CGS :

In their amendment application, the licensee stated the same justification as that given for the NRC-approved TSTF. Staffing requirements will be met through compliance with the regulations and are not required to be reiterated in the TSs. The change which delegates the details of work hour controls to site processes is an administrative change that will not result in impaired performance due to excessive work hours, and will not jeopardize plant safety.

TS 5.2.2.c, TS 5.2.2.f, and TS 5.2.2.g are renumbered to TS 5.2.2.b, TS 5.2.2.e, and TS 5.2.2.f, respectively. The revised numbering and wording matches NUREG-1433, Revision 2.

### 3.2 Revision of TS 5.3, Unit Staff Qualifications

Description of Change and Justification:

In this portion of TSTF-258, Revision 4, a new TS 5.3.2 is added which incorporates the regulatory definitions for the SRO and RO positions for the purpose of explicitly applying 10 CFR 55.4. The justification given in the NRC-approved TSTF is that 10 CFR 55.4 states that, "Actively performing the functions of an operator or senior operator means that an individual has a position on the shift crew that requires the individual to be licensed as defined in the facility's technical specifications..." Adding paragraph 5.3.2 ensures that there is no misunderstanding when complying with 10 CFR 55.53 requirements. The minimum staffing requirements stipulated in 10 CFR 50.54(m), for unit members actively performing the functions of an operator or senior operator, can be exceeded. This means that the site can take credit for more than the minimum number of watchstanders required by 10 CFR 50.54(m) provided that there are administrative controls which assure that functions and duties are divided and rotated in a manner which provides each watchstander meaningful and significant opportunity to maintain proficiency in the performance of the functions of an RO and/or SRO. This NRC position was previously stated in NUREG-1262. The revised wording matches NUREG-1433, Revision 2.

Applicability to CGS:

In their amendment application, the licensee stated the same justification as that given for the NRC-approved TSTF. This added TS provision is considered administrative because none of the existing manning requirements are changed; therefore, the NRC staff concludes that the change is acceptable.

### 3.3 Revision of TS 5.5.4, Radioactive Effluent Controls Program

Description of Change and Justification:

In this portion of TSTF-258, Revision 4, TS 5.5.4 on the Radioactive Effluent Controls Program is being modified to be consistent with the revision to 10 CFR Part 20. The CGS TSs have previously incorporated the TSTF changes to limitations on the dose rate resulting from radioactive material released in gaseous effluents to areas at or beyond the site boundary, except for minor wording changes which are administrative changes. In addition, the provisions of Surveillance Requirement (SR) 3.0.2 are applied to the Radioactive Effluent Controls Program surveillance frequencies to allow for scheduling flexibility. SR 3.0.2 permits a 25 percent extension of the interval specified in the frequency (31 days). Allowing a 25 percent extension in the frequency of performing the monthly cumulative dose and projected dose calculation for the current quarter/year will have no effect on the outcome of the calculations. SR 3.0.3 is added in association with SR 3.0.2 to maintain consistency of the TS application.

Applicability to CGS:

In their amendment application, the licensee stated the same justification as that given for the NRC-approved TSTF. The proposed TS changes maintain the same overall level of program controls while providing operational flexibility. The licensee proposed the same changes to the TSs that are given in the TSTF. The NRC staff concludes that the changes are acceptable.

### 3.4 Revision of TS 5.6.4, Monthly Operating Reports

Description of Change and Justification:

This portion of TSTF-258, Revision 4, deletes the requirement to provide an annual report of all challenges to safety/relief valves from TS 5.6.4. NRC Generic Letter 97-02, "Revised Contents of the Monthly Report" requests the submittal of less information in the monthly operating report. The generic letter identifies what needs to be reported to support the NRC Performance Indicator Program, and availability and capacity statistics. The generic letter does not specifically identify the need to report challenges to the safety and relief valves. This information is not required for the Performance Indicator Program, and malfunctions during reportable plant transients would be discussed in Licensee Event Reports. Based on this information, it is acceptable to delete the requirements to provide documentation of all challenges to the safety and relief valves. The revised wording matches NUREG-1433, Revision 2.

#### Applicability to CGS:

In their amendment application, the licensee stated the same justification as that given for the NRC-approved TSTF. The licensee proposed the same changes to the TSs that are given in the TSTF. The NRC staff concludes that the changes are acceptable.

### 3.5 Revision of TS 5.7, High Radiation Areas

#### Description of Change and Justification:

In this portion of TSTF-258, Revision 4, TS Section 5.7, High Radiation Area, is revised in accordance with 10 CFR 20.1601(c) and is updated with acceptable alternate controls to those provided in 10 CFR 20.1601. The CGS TSs were previously revised during the conversion to the ISTS to incorporate many of the changes detailed in TSTF-258. Therefore, only those TSTF-258 changes that are applicable now are discussed below. Paragraphs are rearranged and reworded to match TSTF-258 and NUREG-1433, Revision 2; the requirements remain equivalent to existing requirements.

TS 5.7.1.e and TS 5.7.2.e are revised to include allowing entry into a high radiation area before dose surveys have been performed by personnel not qualified in radiation protection procedures who are continuously escorted by qualified personnel. These continuously escorted personnel shall receive a pre-job briefing prior to entry into such areas. This option provides adequate protection while minimizing exposure to the qualified individual.

TS 5.7.2.a is revised to allow the entry control to a high radiation area to be a continuously guarded door or gate. This change is consistent with Section 2.5 of NRC Regulatory Guide 8.38, "Control of Access to High and Very High Radiation Areas of Nuclear Plants," which indicates the use of a locked door or one control point where positive control over personnel entry is exercised. Posting an individual to monitor a door provides positive controls over a high radiation area.

TS 5.7.2.a.1 is revised to allow the keys to high radiation areas to be controlled by the shift supervisor, radiation protection manager, or his or her designee. It had previously stated that the keys would be under the control of Shift Manager or health physics supervisor on duty. Other personnel, such as the shift supervisor, have the need to control access to high radiation areas, have the training to understand the hazards involved, and can enforce the requirements for entry into these areas.

TS 5.7.2.f is revised to delete the requirement for a high radiation area with dose rates greater than 1 rem/hour which is controlled by barricades, postings, and flashing lights to be within a larger area that is controlled as a high radiation area. The larger area radiation controls, which encompass the control area that is being deleted, are sufficient to control radiation doses to personnel. The revised wording of TS 5.7 matches NUREG-1433, Revision 2.

#### Applicability to CGS :

In their amendment application, the licensee proposed the same changes to the TSs that are given in the TSTF. The proposed changes to the controls for high radiation areas provide

reasonable assurance that radiation doses to personnel will be properly controlled. The NRC staff concludes that the changes are acceptable.

#### 4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Washington State official was notified of the proposed issuance of the amendment. The State official had no comments.

#### 5.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (67 FR 75870). The amendment also relates to changes in recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) and 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

#### 6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (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 the Commission's 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.

Principal Contributor: Brian Benney

Date: January 9, 2003