

**ENERGY
NORTHWEST**

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

April 17, 2003
GO2-03-063

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 TECHNICAL SPECIFICATION 4.2.1
AND 5.6.5.b, CORRECTIONS TO ORIGINAL SUBMITTAL**

- References:
- 1) Letter GO2-02-138, dated September 3, 2002, RL Webring (Energy Northwest) to NRC, "Request for Amendment to Technical Specification 4.2.1 and 5.6.5.b"
 - 2) Letter GO2-02-192, dated November 27, 2002, DW Coleman (Energy Northwest) to NRC, "Request for Amendment to Technical Specification 4.2.1 and 5.6.5.b, Corrections to Original Submittal"

Dear Sir or Madam:

The referenced letters requested an amendment to the Columbia Generating Station Technical Specifications (TS). A correction that should be made to the submittal has been identified. This correction involves removing "Insert 1" from the marked up pages and proposed final typed TS pages included in the submittal. Review has indicated that this information, as shown on TSTF-363, was not intended to become a part of TS 5.6.5.b.

Accordingly, you are requested to replace the proposed final typed TS pages 5.6-3 and 5.6-4 submitted by the referenced transmittal with the attachment to this letter.

An evaluation of the proposed change has been performed in accordance with 10 CFR 50.91(a)(1) regarding no significant hazards consideration using the standards in 10 CFR 50.92(c). A discussion of these standards as they relate to this amendment request follows:

A001

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CORRECTIONS TO ORIGINAL SUBMITTAL**

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

Response: No.

This change does not affect the requirement to use NRC approved methods to determine core operating limits based on methods previously found acceptable by the NRC and listed in TS section 5.6.5.b.

The requested TS change does not involve any plant modifications or operational changes that could affect system reliability, performance, or possibility of operator error. The requested change does not affect any postulated accident precursors, does not affect any accident mitigation systems, and does not introduce any new accident initiation mechanisms.

Therefore, this change does not increase the probability or consequences of any 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 change to the TS is administrative. The proposed change does not involve any new modes of operation, any changes to setpoints, or any plant modifications. The core operating limits will continue to be developed using NRC-approved methods that account for the mixed fuel core design. The proposed change does not result in any new precursors to an accident.

Therefore, this change 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 core operating limits will continue to be determined using methodologies that have been approved by the NRC.

On this basis, the implementation of the change does not involve a significant reduction in margin of safety.

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

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The Energy Northwest staff regrets any inconvenience this discrepancy may have caused.

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

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

Respectfully,

A handwritten signature in black ink, appearing to read "DW Coleman, acting for". The signature is fluid and cursive.

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

Enclosure: Notarized Affidavit

Attachment: Typed Revised Technical Specification Pages

cc: EW Merschoff – NRC RIV
BJ Benney – NRC NRR
NRC Resident Inspector – 988C
RN Sherman – BPA/1399
TC Poindexter – Winston & Strawn
JO Luce – EFSEC

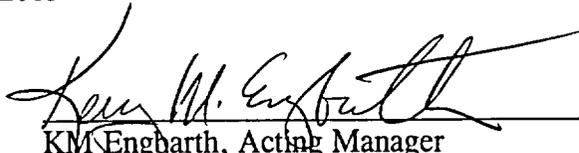
Notarized Affidavit
Enclosure 1

STATE OF WASHINGTON)
)
COUNTY OF BENTON)

Subject: Amendment to Technical
Specification 4.2.1 and
5.6.5.b, Corrections to
Original Submittal

I, KM Engbarth, being duly sworn, subscribe to and say that I am the Acting Manager, Performance Assessment and Regulatory Programs 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.

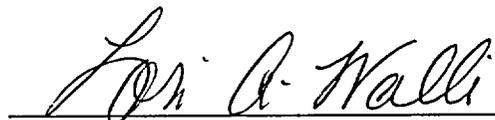
DATE 4/17/03, 2003



KM Engbarth, Acting Manager
Performance Assessment and Regulatory Programs

On this date personally appeared before me KM Engbarth, to me known to be the individual who executed the foregoing instrument, and acknowledged that she signed the same as her free act and deed for the uses and purposes herein mentioned.

GIVEN under my hand and seal this 17 day of April 2003.



Notary Public in and for the
STATE OF WASHINGTON



Residing at Benton County
My Commission Expires 3-29-05

**REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATION 4.2.1 AND
5.6.5.b, CORRECTIONS TO ORIGINAL SUBMITTAL**
Attachment

Typed Revised Technical Specification Pages 5.6-3 and 5.6-4

5.6 Reporting Requirements

5.6.5 CORE OPERATING LIMITS REPORT (COLR) (continued)

- b. The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC, specifically those described in the following documents:
1. XN-NF-81-58(P)(A), "RODEX2 Fuel Rod Thermal-Mechanical Response Evaluation Model," Exxon Nuclear Company
 2. XN-NF-85-67(P)(A), "Generic Mechanical Design for Exxon Nuclear Jet Pump BWR Reload Fuel," Exxon Nuclear Company
 3. EMF-85-74(P) Supplement 1(P)(A) and Supplement 2(P)(A), "RODEX2A (BWR) Fuel Rod Thermal-Mechanical Evaluation Model," Siemens Power Corporation
 4. ANF-89-98(P)(A), "Generic Mechanical Design Criteria for BWR Fuel Designs," Advanced Nuclear Fuels Corporation
 5. XN-NF-80-19(P)(A) Volume 1, "Exxon Nuclear Methodology for Boiling Water Reactors - Neutronic Methods for Design and Analysis," Exxon Nuclear Company
 6. XN-NF-80-19(P)(A) Volume 4, "Exxon Nuclear Methodology for Boiling Water Reactors: Application of the ENC Methodology to BWR Reloads," Exxon Nuclear Company
 7. EMF-2158(P)(A), "Siemens Power Corporation Methodology for Boiling Water Reactors: Evaluation and Validation of CASMO-4/MICROBURN-B2," Siemens Power Corporation
 8. XN-NF-80-19(P)(A) Volume 3, "Exxon Nuclear Methodology for Boiling Water Reactors, THERMEX: Thermal Limits Methodology Summary Description," Exxon Nuclear Company
 9. XN-NF-84-105(P)(A) Volume 1, "XCOBRA-T: A Computer Code for BWR Transient Thermal-Hydraulic Core Analysis," Exxon Nuclear Company

(continued)

5.6 Reporting Requirements

5.6.5 CORE OPERATING LIMITS REPORT (COLR) (continued)

10. ANF-524(P)(A), "ANF Critical Power Methodology for Boiling Water Reactors," Advanced Nuclear Fuels Corporation
11. ANF-913(P)(A) Volume 1 "COTRANSA2: A Computer Program for Boiling Water Reactor Transient Analysis," Advanced Nuclear Fuels Corporation
12. ANF-1358(P)(A) "The Loss of Feedwater Heating Transient in Boiling Water Reactors," Advanced Nuclear Fuels Corporation
13. EMF-2209(P)(A), "SPCB Critical Power Correlation," Siemens Power Corporation
14. EMF-2245(P)(A), "Application of Siemens Power Corporation's Critical Power Correlations to Co-Resident Fuel," Siemens Power Corporation
15. EMF-2361(P)(A), "EXEM BWR-2000 ECCS Evaluation Model," Framatome ANP Richland
16. EMF-2292(P)(A), "ATRIUM™ -10: Appendix K Spray Heat Transfer Coefficients," Siemens Power Corporation
17. EMF-CC-074(P)(A) Volume 4, "BWR Stability Analysis-Assessment of STAIF with Input from MICROBURN-B2," Siemens Power Corporation
18. CENPD-300-P-A, "Reference Safety Report for Boiling Water Reactor Reload Fuel," ABB Combustion Engineering Nuclear Operations
19. NEDO-32465-A, "BWR Owners' Group Reactor Stability Detect and Suppress Solutions Licensing Basis Methodology and Reload Applications"

(continued)
