

December 16, 2003

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

SUBJECT: REVISION 10 TO THE QUALITY ASSURANCE PROGRAM DESCRIPTION
FOR COLUMBIA GENERATING STATION (TAC NO. MC1255)

Dear Mr. Parrish:

By letter dated October 23, 2003, Energy Northwest submitted a change to the quality assurance program description for Columbia Generating Station in accordance with the provisions of 10 CFR 50.54(a). Pursuant to 10 CFR 50.54(a)(4), Energy Northwest identified the change as one that constitutes a reduction in commitment and, therefore, requires NRC approval prior to implementation. The reduction in commitment proposes a change in the responsibilities of the Plant Operations Committee.

Our review and the basis for finding the proposed change to be acceptable are documented in the enclosed safety evaluation. The reduction in commitment continues to satisfy the guidelines of ANSI N18.7, as endorsed by Regulatory Guide 1.33, Revision 2, "Quality Assurance Requirements (Operation)," and is, therefore, acceptable.

If you have any questions, please contact me at (301) 415-3764.

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

Enclosure: Safety Evaluation

cc w/encl: See next page

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Columbia Generating Station

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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

PROPOSED REVISION 10 TO THE QUALITY ASSURANCE PROGRAM

ENERGY NORTHWEST

COLUMBIA GENERATING STATION

DOCKET NO. 50-397

1.0 INTRODUCTION

By letter dated October 23, 2003, Energy Northwest (the licensee), submitted a change to the quality assurance (QA) program for the Columbia Generating Station, in accordance with the provisions of 10 CFR 50.54(a).

The licensee has determined that the change to the QA program constitutes a reduction in commitment, as specified by 10 CFR 50.54(a)(4), and requires NRC approval prior to implementation. This change would clarify the licensee's commitment to ANSI N18.7-1976, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants," regarding the responsibilities of the Plant Operations Committee (POC) which is the independent review body.

2.0 REGULATORY EVALUATION

Regulatory Guide (RG) 1.33, Revision 2, "Quality Assurance Requirements (Operation)," describes a method acceptable to the NRC staff for complying with the Commission's regulations with regard to overall QA program requirements for the operational phase of nuclear power plants and endorses the guidelines of ANSI N18.7-1976 subject to the regulatory position of RG 1.33, Revision 2, Section C. Section II.2 of Chapter 13.4, "Operational Review," of the Standard Review Plan, Revision 4, states that the independent review function should meet the guidelines described in Section 4.3 of ANSI N18.7.

The licensee's QA program conforms to RG 1.33, Revision 2, and is described in the "Operational Quality Assurance Program Description (OQAPD)" (Procedure No. WPPSS-QA-004, Revision 9). Section 2.0 of the OQAPD describes the review and audit responsibilities of the licensee's POC.

Appendix III, Section 2.1.6.e, of the OQAPD, describes a POC responsibility function to investigate, prepare, and forward reports of all violations of the plant or independent spent fuel storage installation technical specifications. The OQAPD states the following in Appendix III, Section 2.1.6.e.

Investigation of all violations of the plant or Independent Spent Fuel Storage Installation technical specifications, including the preparation and forwarding of reports covering the evaluation and recommendations to prevent recurrence, to the Chief Nuclear Officer and to the Corporate Nuclear Safety Review Board.

The proposed change clarifies the POC responsibility as an independent review body and states as follows:

Review of all deviations of applicable codes, regulations, orders, technical specifications, license requirements, or internal procedures or instructions that affect nuclear safety. The results of these reviews will be forwarded to the Chief Nuclear Officer and to the Corporate Nuclear Safety Review Board.

3.0 TECHNICAL EVALUATION

The proposed change maintains the POC's independent review function as described in Section 4.3 of ANSI N18.7-1976 and endorsed by RG 1.33, Revision 2. Investigations, preparation, and forwarding of reports of violations, previously a POC responsibility, will continue to be performed in accordance with the licensee's corrective action program under the guidance of the Performance Management Department and reported to the POC, Chief Nuclear Officer, and Corporate Nuclear Safety Review Board.

Based upon the licensee's description of the proposed change, the staff finds the reduction in commitment to be acceptable.

4.0 CONCLUSION

The proposed change is consistent with the guidance for independent review as described in Section 4.3 of ANSI N18.7-1976 and endorsed by RG 1.33, Revision 2. The proposed change is acceptable in that the reduction in commitment continues to conform to a method acceptable to the NRC staff for complying with the Commission's regulations with regard to overall quality assurance program requirements for the operational phase of nuclear power plants.

Principal Contributor: Steve Dennis

Date: December 16, 2003