

December 18, 2003
GO2-03-187

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

Subject: **COLUMBIA GENERATING STATION, DOCKET NO. 50-397
LETTER OF INTENT TO PARTICIPATE IN PROBABILISTIC RISK
ASSESSMENT QUALITY PILOT APPLICATION PROGRAM**

- References:
1. Memorandum dated December 3, 2003, Peter C. Wen, NRR to Cathy Haney, NRR, Summary of November 20, 2003, "Meeting with Nuclear Energy Institute (NEI) Regarding Probabilistic Risk Assessment Quality Pilot Applications."
 2. Memorandum dated November 19, 2003, J. L. Funches, CFO, NRR to James E. Dyer, Director, NRR, "Fee Waiver for Pilot Application of Approach Proposed in DG-1122, "Determining the Technical Adequacy of PRA Results for Risk-Informed Activities," and The Associated Draft Standard Review Plan (SRP) Section."

Dear Sir or Madam:

As requested at the Reference 1 meeting on November 20, 2003, Energy Northwest submits this letter of intent to participate in the NRC probabilistic risk assessment pilot program to guide implementation of Regulatory Guide 1.200 For Trial Use, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities," and the associated draft standard review plan, Chapter 19.1, "Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities."

The pilot application Energy Northwest proposes to submit is a license amendment request (LAR) to extend the Technical Specification (TS) Completion Time (CT) of the Limiting Condition For Operation 3.8.1 with one required diesel generator inoperable from the current CT limit of 72 hours to 14 days. The LAR will include other associated TS changes necessary to allow on-line maintenance of the Columbia emergency diesel generators.

The NRC has indicated this review of pilot applications is eligible for a waiver of review fees (Reference 2). Our participation in this pilot program is contingent on the NRC granting a fee waiver for the full LAR review pursuant to 10 CFR Part 170.11(b)(1).

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Our current schedule for submitting the LAR is February 24, 2004. Our current plant maintenance schedule would necessitate that we target NRC completion of the LAR by October 2004 with implementation within 60 days of approval.

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

Respectfully,



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Vice President, Nuclear Generation
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cc: BS Mallet - NRC RIV
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