

ENERGY NORTHWEST

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April 16, 2004
GO2-04-072

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

Subject: **COLUMBIA GENERATING STATION
DOCKET NUMBER 50-397
REPLY TO NON-CITED VIOLATION: 50-397/03-07-01**

Reference: Letter dated January 30, 2004, from WB Jones (NRC) to JV Parrish (Energy Northwest), "Columbia Generating Station - NRC Integrated Inspection Report 05000397/2003007"

Dear Sir or Madam:

In the referenced inspection report, the Nuclear Regulatory Commission (NRC) provided Energy Northwest with the results of NRC inspection activities at Columbia Generating Station (CGS) from October 5, 2003, through December 31, 2003. Included in this inspection report was a green finding with an associated non-cited violation (NCV) regarding the conduct of local leak rate testing (LLRT) for the main steam isolation valves (MSIVs) (NCV 50-397/03-07-01). The purpose of this letter is to request that this NCV be withdrawn and provide a summary of the actions that Energy Northwest is pursuing concerning this issue. On February 23, 2004, an extension to the normal 30-day response time was requested by Mr. Douglas Coleman (Energy Northwest) and granted by Mr. William Jones (NRC, Region IV). The time to respond was extended from February 29, 2004, to mid-April 2004.

Non-cited violation 50-397/03-07-01 was issued based on the NRC determination that Energy Northwest had performed inadequate MSIV LLRTs since initial plant startup. The NCV states that the NRC considered the test methodology to be inadequate because, "Energy Northwest utilized nonsafety related instrument air to help close and seat the valves during testing." The NCV also stated that the non-safety related instrument air that recharges the safety related accumulators provides "substantially more seating pressure than the safety related air accumulators." The NRC also concluded in the inspection report that an immediate or existing safety concern does not exist. This conclusion is based on an Energy Northwest analysis verifying that, if the testing had been performed under conditions suggested by the NRC, the MSIVs would still have passed the leakage rate testing.

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Energy Northwest understands the NRC concerns as stated in the NCV. However, we believe that applicable NRC regulations (10 CFR 50 Appendix J, III.C.1) and industry codes that discuss closing valves for local leak rate testing (ANSI/ANS 56.8 - 1994, which is endorsed in NRC Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program") are subject to interpretation with respect to the required qualification (safety related or non-safety related) of the motive source used to close the valve. For example, 10 CFR 50 Appendix J, III.C.1, states that each valve to be tested shall be closed by *normal operation* and without any preliminary exercising or adjustments. ANSI/ANS 56.8 - 1994, Section 3.3.3, states that closure of primary containment isolation valves for Type C testing shall be accomplished by *normal or equivalent means* and without adjustment. Energy Northwest considers closure of the MSIVs with the non-safety related air sources to be the "normal means" of closing the MSIVs at CGS.

Based on the above, Energy Northwest does not believe that issuance of NCV 50-397/03-07-01 was warranted and respectfully requests that this non-cited violation be withdrawn by NRC.

Energy Northwest believes that testing of MSIVs with a non-safety related air source providing seating pressure is a common practice within the industry and therefore this issue is generic in nature. Energy Northwest is coordinating with the BWR Owners Group (BWROG) to determine if the issue raised by the NRC in NCV 50-397/03-07-01 should be addressed on a generic basis and to determine if there should be a future BWROG role in pursuing resolution of this issue. To initiate these efforts, the BWROG has established an MSIV Testing Ad Hoc Committee, with the first meeting scheduled for May 19 and 20, 2004. If the BWROG MSIV Testing Ad Hoc Committee determines that BWROG should assume a role in this area, then additional actions and activities will be developed.

As noted in the referenced inspection report, this issue has been documented in our corrective action program and is not currently considered to be an immediate or existing safety concern. Based on the results of testing and analysis produced during our previous refueling outage, we agree that performing MSIV LLRTs with use of safety related air only is a conservative method for ensuring that the MSIVs are capable of performing their intended design function. Energy Northwest is currently planning to conduct MSIV LLRT testing with only safety-related air sources providing seating pressure to the valves during our next refueling outage.

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

Respectfully,



RL Webring (Mail Drop PE04)
Vice President, Nuclear Generation

cc: BS Mallett - NRC - RIV
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