

September 27, 2004 GO2-04-165

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

Solutions

Subject: COLUMBIA GENERATING STATION DOCKET NO. 50-397 LICENSE AMENDMENT REQUEST REMOVAL OF THE MONTHLY OPERATING REPORT AND THE OCCUPATIONAL RADIATION EXPOSURE REPORT FROM TECHNICAL SPECIFICATION USING THE CONSOLIDATED LINE ITEM IMPROVEMENT PROCESS (CLIIP)

Dear Sir or Madam:

In accordance with the provisions of Section 50.90 of Title 10 of the *Code of Federal Regulations* (10 CFR), Energy Northwest is submitting a request for an amendment to the technical specifications (TS) for Columbia Generating Station.

The proposed amendment would delete the TS requirements to submit monthly operating reports and occupational radiation exposure reports. The change is consistent with NRC-approved Revision 1 to Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-369, "Removal of Monthly Operating Report and Occupational Radiation Exposure Report." The availability of this TS improvement was announced in the <u>Federal Register</u> on June 23, 2004 (69 FR 35067) as part of the consolidated line item improvement process (CLIIP).

Attachment 1 provides a description of the proposed change and confirmation of applicability. Attachment 2 provides the existing TS pages marked-up to show the proposed change. Attachment 3 provides a summary of the regulatory commitment made in this submittal.

REMOVAL OF THE MONTLY OPERATING REPORT AND THE OCCUPATIONAL RADIATION EXPOSURE REPORT FROM TECHNICAL SPECIFICATION USING THE CONSOLIDATED LINE ITEM IMPROVEMENT PROCESS (CLIIP) Page 2

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

Should you have any questions or require additional information regarding this matter, please contact Mr. DW Coleman, Regulatory Programs Manager, at (509) 377-4342.

Respectfully,

RL'Webring ⁷ Vice President, Nuclear Generation Mail Drop PE04

Attachments: 1. Description and Assessment

- 2. Proposed Technical Specification Changes (markup)
- 3. Regulatory Commitment
- cc: BS Mallett NRC RIV WA Macon - NRC NRR NRC Sr. Resident Inspector - 988C RN Sherman - BPA/1399 TC Poindexter - Winston & Strawn JO Luce – EFSEC RR Cowley - WDOH

STATE OF WASHINGTON) COUNTY OF BENTON) Subject: Technical Specification Removal of the Monthly Operating Report and Occupational Radiation Exposure Report

I, RL Webring, being duly sworn, subscribe to and say that I am the Vice President, Nuclear Generation 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 9/27/04 .2004

RL Webring Vice President, Nuclear Generation

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

GIVEN under my hand and seal this 27th day of September 2004.



Motary Public in and for the STATE OF WASHINGTON

Residing at

My Commission Expires___

REMOVAL OF THE MONTHLY OPERATING REPORT AND THE OCCUPATIONAL RADIATION EXPOSURE REPORT FROM TECHNICAL SPECIFICATION USING THE CONSOLIDATED LINE ITEM IMPROVEMENT PROCESS (CLIIP) Attachment 1 Page 1 of 3

Description and Assessment

1.0 INTRODUCTION

The proposed license amendment deletes the requirements in Technical Specification (TS) 5.6.1 for an annual report on occupational radiation exposures and TS 5.6.4 for a monthly report of operating statistics and shutdown experience.

The changes are consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-369, "Removal of Monthly Operating Report and Occupational Radiation Exposure Report," Revision 1. The availability of this technical specification improvement was announced in the <u>Federal Register</u> on June 23, 2004 (69 FR 35067), as part of the consolidated line item improvement process (CLIIP).

2.0 DESCRIPTION OF PROPOSED AMENDMENT

Consistent with the NRC-approved Revision 1 of TSTF-369, the proposed TS changes include:

TS 5.6.1	Occupational Radiation Exposure Report		

TS 5.6.4 Monthly Operating Reports Deleted

As addressed in the safety evaluation published in the Notice of Availability for TSTF-369, the removal of TS 5.6.1 and TS 5.6.4 resulted in various editorial and formatting changes such as the renumbering of TS sections. These changes reflect the renumbering of TS sections but do not revise technical or administrative requirements.

3.0 BACKGROUND

The background for this application is adequately addressed by the NRC Notice of Availability published on June 23, 2004 (69 FR 35067) and TSTF-369.

4.0 REGULATORY REQUIREMENTS AND GUIDANCE

The applicable regulatory requirements and guidance associated with this application is adequately addressed by the NRC Notice of Availability published on June 23, 2004 (69 FR 35067) and TSTF-369.

REMOVAL OF THE MONTHLY OPERATING REPORT AND THE OCCUPATIONAL RADIATION EXPOSURE REPORT FROM TECHNICAL SPECIFICATION USING THE CONSOLIDATED LINE ITEM IMPROVEMENT PROCESS (CLIIP) Attachment 1 Page 2 of 3

5.0 TECHNICAL ANALYSIS

Energy Northwest has reviewed the safety evaluation (SE) published on June 23, 2004 (69 FR 35067) as part of the CLIIP Notice of Availability. This verification included a review of the NRC staff's SE and the supporting information provided to support TSTF-369. Energy Northwest has concluded that the justifications presented in the TSTF proposal and the SE prepared by the NRC staff are applicable to Columbia Generating Station and justify this amendment for the incorporation of the changes to the Columbia Generating Station TS.

6.0 **REGULATORY ANALYSIS**

A description of this proposed change and its relationship to applicable regulatory requirements and guidance was provided in the NRC Notice of Availability published on June 23, 2004 (69 FR 35067) and TSTF-369.

6.1 Verification and Commitment

As discussed in the model SE published in the <u>Federal Register</u> on June 23, 2004 (69 FR 35067) for this TS improvement, Energy Northwest is making the following regulatory commitment:

Energy Northwest is making a regulatory commitment to provide to the NRC using the industry, Consolidated Data Entry (CDE) database, the operating data (for each calendar month) that is described in Generic Letter 97-02 "Revised Contents of the Monthly Operating Report," by the 21st of the month following the end of the calendar quarter.

7.0 NO SIGNIFICANT HAZARDS CONSIDERATION

Energy Northwest has reviewed the proposed no significant hazards consideration determination published on June 23, 2004 (69 FR 35067) as part of the CLIIP. Energy Northwest has concluded that the proposed determination presented in the notice is applicable to Columbia Generating Station and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

8.0 ENVIRONMENTAL EVALUATION

Energy Northwest has reviewed the environmental evaluation included in the model SE published on June 23, 2004 (69 FR 35067) as part of the CLIIP. Energy Northwest has concluded that the staff's findings presented in that evaluation are applicable to Columbia Generating Station and the evaluation is hereby incorporated by reference for this application.

REMOVAL OF THE MONTHLY OPERATING REPORT AND THE OCCUPATIONAL RADIATION EXPOSURE REPORT FROM TECHNICAL SPECIFICATION USING THE CONSOLIDATED LINE ITEM IMPROVEMENT PROCESS (CLIIP) Attachment 1 Page 3 of 3

9.0 PRECEDENT

This application is being made in accordance with the CLIIP. Energy Northwest is not proposing variations or deviations from the TS changes described in TSTF-369 or the NRC staff's model SE published on June 23, 2004 (69 FR 35067).

10.0 REFERENCE

Federal Register Notice: Notice of Availability of Model Application Concerning Technical Specifications Improvement to Eliminate Requirements to Provide Monthly Operating Reports and Occupational Radiation Exposure Reports Using the Consolidated Line Item Improvement Process, published June 23, 2004 (69 FR 35067). REMOVAL OF THE MONTHLY OPERATING REPORT AND THE OCCUPATIONAL RADIATION EXPOSURE REPORT FROM TECHNICAL SPECIFICATION USING THE CONSOLIDATED LINE ITEM IMPROVEMENT PROCESS (CLIIP) Attachment 2

PROPOSED TECHNICAL SPECIFICATION CHANGES (Markup)

Pages

5.5-1 5.6-1 5.6-2 5.6-3 5.6-4 5.6-5 3.3.3.1-1 3.3.3.1-2

1.1-2

Definitions 1.1

1.1 Definitions (continued)

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CHANNEL FUNCTIONAL TEST	A CHANNEL FUNCTIONAL TEST shall be the injection of a simulated or actual signal into the channel as close to the sensor as practicable to verify OPERABILITY, including required alarm, interlock, display, and trip functions, and channel failure trips. The CHANNEL FUNCTIONAL TEST may be performed by means of any series of sequential, overlapping, or total channel steps so that the entire channel is tested.	
CORE ALTERATION	CORE ALTERATION shall be the movement of any fuel, sources, or reactivity control components within the reactor vessel with the vessel head removed and fuel in the vessel. The following exceptions are not considered to be CORE ALTERATIONS:	
	 Movement of source range monitors, local power range monitors, intermediate range monitors, traversing incore probes, or special movable detectors (including undervessel replacement); and 	
	b. Control rod movement, provided there are no fuel assemblies in the associated core cell.	
<i>,</i>	Suspension of CORE ALTERATIONS shall not preclude completion of movement of a component to a safe position.	
CORE OPERATING LIMITS REPORT (COLR)	The COLR is the unit specific document that provides cycle specific parameter limits for the current reload cycle. These cycle specific limits shall be determined for each reload cycle in accordance with Specification 5.6.6. Plant operation within these limits is addressed in individual Specifications.	
DOSE EQUIVALENT I-131	DOSE EQUIVALENT I-131 shall be that concentration of I-131 (microcuries/gram) that alone would produce the same thyroid dose as the quantity and isotopic mixture of I-131, I-132, I-133, I-134, and I-135 actually present. The thyroid dose conversion factors used for this calculation shall be those listed in Table III of TID-14844, AEC, 1962, "Calculation of Distance Factors for	

(continued)

Columbia Generating Station 1.1-2

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Programs and Manuals 5.5

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5.0 ADMINISTRATIVE CONTROLS

5.5 Programs and Manuals

The following programs shall be established, implemented, and maintained.

5.5.1 Offsite Dose Calculation Manual (ODCM)

- a. The ODCM shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm and trip setpoints, and in the conduct of the radiological environmental monitoring program; and
- b. The ODCM shall also contain the radioactive effluent controls and radiological environmental monitoring activities, and descriptions of the information that should be included in the Annual Radiological Environmental Operating and Radioactive Effluent Release reports required by Specification 5.6, and Specification 5.6, .

c. Licensee initiated changes to the ODCM:

- 1. Shall be documented and records of reviews performed shall be retained. This documentation shall contain:
 - (a) Sufficient information to support the change(s) together with the appropriate analyses or evaluations justifying the change(s), and
 - (b) A determination that the change(s) maintain the levels of radioactive effluent control required pursuant to 10 CFR 20.1302, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I, and do not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations;
- Shall become effective after review and acceptance by the Plant Operations Committee and the approval of the Plant General Manager; and

(continued)

Reporting Requirements 5.6

5.0 ADMINISTRATIVE CONTROLS

5.6 Reporting Requirements

The following reports shall be submitted in accordance with 10 CFR 50.4.

5.6.1	Occupational Radiation Exposure Report
	A tabulation on an annual basis of the number of station, utility, and other personnel (including contractors) for whom monitoring was performed, receiving an annual deep dose equivalent of > 100 mrems and the associated collective deep dose equivalent (neverted in more receiving to work and ich functions (or a
	reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling). This tabulation supplements the
	requirements of 10 CFR 20.2206. The dose assignments to various duty functions may be estimated based on electronic or pocket dosimeter, thermoluminescent dosimeter (TLD), or film badge
	measurements. Small exposures totalling < 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole body dose received from external sources should be assigned to specific major work functions. The report
	shall be submitted by April 30 of each year.

Annual Radiological Environmental Operating Report

The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted by May 15 of each year. The report shall include summaries, interpretations, and analyses of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in the Offsite Dose Calculation Manual (ODCM), and in 10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.

The Annual Radiological Environmental Operating Report shall include the results of analyses of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in the table and figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements in the format of the table in the Radiological Assessment Branch Technical Position, Revision 1, November 1979. In the event that some individual results are not available for inclusion with the report, the

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Columbia Generating Station

5.6-1

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liquid and gaseous effluents and solid waste released from the unit. The material provided shall be consistent with the objectives outlined in the ODCM and the Process Control Program and in conformance with 10 CFR 50.36a and 10 CFR 50, Appendix I, Section IV.B.1.

5.6.4 Monthly Operating Reports

Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis no later than the 15th of each month following the calendar month covered by the report-



CORE OPERATING LIMITS REPORT (COLR)

- Core operating limits shall be established prior to each a. reload cycle, or prior to any remaining portion of a reload cycle, and shall be documented in the COLR for the following:
 - 1. The APLHGR for Specification 3.2.1;
 - 2. The MCPR for Specification 3.2.2;
 - 3. The LHGR for Specification 3.2.3; and
 - 4. LCO 3.3.1.3, "Oscillation Power Range Monitor (OPRM) Instrumentation."

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5.6.8 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: XN-NF-81-58(P)(A), "RODEX2 Fuel Rod Thermal-Mechanical 1. 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 XN-NF-80-19(P)(A) Volume 4, "Exxon Nuclear Methodology 6. 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 XN-NF-80-19(P)(A) Volume 3, "Exxon Nuclear Methodology 8. for Boiling Water Reactors, THERMEX: Thermal Limits Methodology Summary Description," Exxon Nuclear Company XN-NF-84-105(P)(A) Volume 1, "XCOBRA-T: A Computer Code 9. for BWR Transient Thermal-Hydraulic Core Analysis," Exxon Nuclear Company

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CORE OPERATING LIMITS REPORT (COLR) (continued) 5.6.5 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 EMF-2361(P)(A). "EXEM BWR-2000 ECCS Evaluation Model," 15. Framatome ANP Richland EMF-2292(P)(A), "ATRIUM[™] -10: Appendix K Spray Heat Transfer 16. Coefficients," Siemens Power Corporation EMF-CC-074(P)(A) Volume 4, "BWR Stability Analysis-17. 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 NEDO-32465-A, "BWR Owners' Group Reactor Stability Detect 19.

and Suppress Solutions Licensing Basis Methodology and Reload Applications"

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5.6-4 Columbia Generating Station

5.6.5 CORE OPERATING LIMITS REPORT (COLR) (continued) The core operating limits shall be determined such that all с. applicable limits (e.g., fuel thermal mechanical limits, core thermal hydraulic limits, Emergency Core Cooling Systems (ECCS) limits, nuclear limits such as SDM, transient analysis limits, and accident analysis limits) of the safety analysis are met. The COLR, including any midcycle revisions or supplements, d. shall be provided upon issuance for each reload cycle to the NRC. 5.6.6 Post_Accident_Monitoring (PAM) Instrumentation_Report

When a report is required by Condition B or F of LCO 3.3.3.1, "Post Accident Monitoring (PAM) Instrumentation," a report shall be submitted within the following 14 days. The report shall outline the preplanned alternate method of monitoring, the cause of the inoperability, and the plans and schedule for restoring the instrumentation channels of the Function to OPERABLE status.

PAM Instrumentation 3.3.3.1

3.3 INSTRUMENTATION

3.3.3.1 Post Accident Monitoring (PAM) Instrumentation

The PAM instrumentation for each Function in Table 3.3.3.1-1 LCO 3.3.3.1 shall be OPERABLE.

APPLICABILITY: MODES 1 and 2.

ACTIONS

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-----NOTES-----1. LCO 3.0.4 is not applicable.

2. Separate Condition entry is allowed for each Function.

CONDITION		REQUIRED ACTION		COMPLETION TIME
Α.	One or more Functions with one required channel inoperable.	A.1	Restore required channel to OPERABLE status.	30 days
в.	Required Action and associated Completion Time of Condition A not met.	B.1	Initiate action in accordance with Specification 5.6.¢.	Immediately
C.	One or more Functions with two or more required channels inoperable.	C.1	Restore all but one required channel to OPERABLE status.	7 days

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PAM Instrumentation 3.3.3.1 ------

ACTIONS				
CONDITION		REQUIRED ACTION		COMPLETION TIME
D.	Required Action and associated Completion Time of Condition C not met.	D.1	Enter the Condition referenced in Table 3.3.3.1-1 for the channel.	Immediately
Ε.	As required by Required Action D.1 and referenced in Table 3.3.3.1-1.	E.1	Be in MODE 3.	12 hours
F.	As required by Required Action D.1 and referenced in Table 3.3.3.1-1.	F.1	Initiate action in accordance with Specification 5.6.8.	Immediately

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REMOVAL OF THE MONTHLY OPERATING REPORT AND THE OCCUPATIONAL RADIATION EXPOSURE REPORT FROM TECHNICAL SPECIFICATION USING THE CONSOLIDATED LINE ITEM IMPROVEMENT PROCESS (CLIIP) Attachment 3

LIST OF REGULATORY COMMITMENTS

The following table identifies the action committed to by Columbia Generating Station in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments. Please direct questions regarding these commitments to DW Coleman at (509) 377-4342.

COMMITMENT	DUE DATE
Columbia Generating Station will provide the operating data (for each calendar month) that is described in Generic Letter 97-02, "Revised Contents of the Monthly Operating Report," by the 21 st of the month following the end of the calendar quarter using the industry, Consolidated Data Entry (CDE) database.	Due the 21 st of the month following the end of the calendar quarter, beginning after the amendment is approved.