

November 22, 2004
G02-04-198

10 CFR 50.55a

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

**SUBJECT: COLUMBIA GENERATING STATION
DOCKET NO. 50-397
REQUEST TO IMPLEMENT 2ISI-30 ADDRESSING USE OF
SUBSEQUENT ASME SECTION XI EDITION AND ADDENDA FOR
CODE CATEGORY B-P**

Dear Sir or Madam:

Pursuant to 10 CFR 50.55a(g)(4)(iv), Energy Northwest hereby requests NRC approval of the following request 2ISI-30 for inservice inspection interval 2, using ASME Section XI, 2001 Edition, 2003 Addenda, Table IWB-2500-1, Examination Category B-P and all related requirements. The details of the 10 CFR 50.55a request are enclosed.

Energy Northwest requests approval of 2ISI-30 by March 15, 2005 to support the pressure test during the spring refuel outage scheduled to begin May 7, 2005.

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

Respectfully,



DK Atkinson
Vice President, Technical Services
Mail Drop PE08

Enclosure: 10 CFR 50.55a Request Number 2ISI-30

cc: BS Mallett - NRC RIV
WA Macon - NRC NRR
NRC Sr. Resident Inspector - 988C

RN Sherman - BPA/1399
TC Poindexter - Winston & Strawn

AA7

**COLUMBIA GENERATING STATION REQUEST TO IMPLEMENT 2ISI-30
ADDRESSING USE OF SUBSEQUENT ASME SECTION XI EDITION AND
ADDENDA FOR CODE CATEGORY B-P**

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10 CFR 50.55A REQUEST NUMBER 2ISI-30

**Proposed Use of Subsequent ASME Code Edition and Addenda
In Accordance with 10 CFR 50.55a(g)(4)(iv)**

1. ASME Code Component(s) Affected

All Code Class 1 pressure retaining components

2. Applicable Code Edition and Addenda

Columbia uses ASME Section XI 1989 edition with no addenda. Columbia is in its second inservice inspection interval, third inspection period.

3. Proposed Subsequent Code Edition and Addenda and Portion

ASME Section XI 2001 Edition, 2003 Addenda, Table IWB-2500-1, Examination Category B-P and all related requirements, incorporated by reference in 10 CFR 50.55a(b) (Federal Register notice 69 FR 58804, October 1, 2004).

4. Related Requirements

When using portions of later editions and addenda of the Code, all related requirements including limitations identified in 10 CFR 50.55a are to be met. The following discussion identifies the related requirements that will also be used when implementing Examination Category B-P.

10 CFR 50.55a, Federal Register 69 FR 58804

Three limitations are identified in 10 CFR 50.55a(b)(2) for pressure testing.

1. (xx) – This paragraph defines hold times for Code Class 2 and 3 system leakage tests. This is not applicable since this request applies to Code Class 1 pressure retaining components.
2. (xxvi) – This paragraph defines pressure testing of mechanical joints during repair and replacement activities. This request does not include repair and replacement activities so this limitation is not applicable.
3. (xxvii) – This paragraph addresses insulation removal when pressure testing Code Class I borated systems. Columbia is a boiling water reactor and does not have Code Class I borated systems, so this limitation is not applicable to this request.

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ASME Section XI

The following related requirements from the 2001 Edition, 2003 Addenda, would be implemented as applicable to Examination Category B-P:

- **Test Requirements – IWB-5220 System Leakage Test**
- **Examination Method – VT-2**
 - IWA-2212 VT-2 Examination
 - IWA-2300 Qualifications of Nondestructive Examination Personnel
 - IWA-5000 System Pressure Tests
- **Acceptance Standard**
 - IWB-3522 Standards for Examination Category B-P, All Pressure Retaining Components.
 - IWB-3142 Acceptance
 - IWA-5250 Corrective Action
 - IWA-5243 Components with Leakage Collection Systems
 - IWA-5242 Insulated Components
 - IWA-5244 Buried Components

5. Duration of Proposed Request

The duration of this request is to the end of the second inservice inspection interval that ends December 12, 2005.