

January 13, 2005  
GO2-05-009

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

Subject: **COLUMBIA GENERATING STATION - DOCKET NO. 50-397;  
CORRECTED PAGE FOR THE LICENSE AMENDMENT REQUEST  
TO REVISE THE REACTOR PRESSURE VESSEL MATERIAL  
SURVEILLANCE PROGRAM**

Reference: Letter dated September 23, 2004, DK Atkinson (Energy Northwest) to  
U.S. NRC, "License Amendment Request to Revise the Reactor  
Pressure Vessel Material Surveillance Program"

Dear Sir or Madam:

In Attachment 1 (page 5 of 7) in the reference letter the word "not" was inadvertently omitted making it appear that the amendment does create the possibility of a new or different kind of accident. This is in error and we have attached a new page with the correct information. Please replace this page in the original letter.

If you have any questions or require additional information regarding this matter, please contact me at (509) 377-4342.

Respectfully,



DW Coleman  
Manager, Regulatory Programs  
Mail Drop PE20

Attachment:

cc: BS Mallett - NRC RIV  
BJ Benney - NRC NRR  
NRC Sr. Resident Inspector - 988C  
RN Sherman - BPA/1399  
TC Poindexter - Winston & Strawn

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**LICENSE AMENDMENT REQUEST TO REVISE THE REACTOR PRESSURE  
VESSEL MATERIAL SURVEILLANCE PROGRAM**

**Attachment 1**

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or testing limit, and will not alter any assumptions or initial conditions previously used in evaluating the radiological consequences of an accident.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

- 2. Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?**

Response: No

The proposed change revises the licensing basis for Columbia Generating Station to reflect participation in the BWRVIP ISP. The NRC has approved the ISP as an acceptable material surveillance program pursuant to 10 CFR 50, Appendix H, paragraph III.C. No physical changes to the plant are associated with the proposed change. No changes in design or operation of any system, structure, or component will be made as a result of the proposed change. The ISP is an alternative monitoring program and cannot create a new failure mode or a new or different kind of accident from any previously evaluated.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

- 3. Does the proposed amendment involve a significant reduction in the margin of safety?**

Response: No

Compliance with RPV material surveillance program requirements specified in 10 CFR 50, Appendix H and the fracture toughness requirements contained in 10 CFR 50, Appendix G ensures an adequate margin of safety exists in the fracture toughness of RPV beltline ferritic materials during any condition of normal operation, anticipated operational occurrence, and system hydrostatic tests. Implementation of the proposed ISP has been evaluated to meet the requirements of 10 CFR 50, Appendix H and this margin of safety is not impacted. Compliance with the requirements of 10 CFR 50, Appendix G will not be affected by this proposed change.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

In conclusion, based on the considerations discussed above; (1) there is a reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner; (2) such activities will be conducted in compliance with the Commission's regulations, and; (3) the issuance of the