

October 10, 2005  
GO2-05-166

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

Subject: **COLUMBIA GENERATING STATION, DOCKET NO. 50-397  
SUBMITTAL OF THE THIRD TEN-YEAR INTERVAL PUMP AND VALVE  
INSERVICE TESTING (IST) PROGRAM PLAN**

Reference: Letter dated April 5, 2004, DK Atkinson (Energy Northwest) to NRC,  
"Notification of 1-Year Extension to Columbia's Second Ten-Year Interval  
Inservice Testing Program Plan"

Dear Sir or Madam:

In accordance with 10 CFR 50.55a, Energy Northwest has revised and submits herewith the third ten-year interval Inservice Testing (IST) program plan for Columbia Generating Station. The IST program plan complies with the requirements of 10 CFR Part 50.55a(b)(3) and Part 50.55(a)(f). The 2001 edition and the 2002 and 2003 Addenda of the American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (OM Code) was incorporated by reference into Paragraph 50.55a(b) by rulemaking effective on November 1, 2004. This code edition and addenda have been approved for use by NRC for IST of pumps and valves subject to certain limitations and modifications.

Where the implementation of certain Code requirements have been determined to be impractical, relief requests have been included in each section with supporting information and proposed alternatives. These requests are required by 10 CFR 50.55a(f)(5)(iv) to be approved by NRC within 12 months after the end of the associated ten-year interval.

The attached third ten-year interval program plan will be implemented on December 13, 2005.

The program plan also contains technical positions to clarify implementation of certain Code requirements.

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In the referenced letter, Energy Northwest informed the NRC of its intention to extend the second ten-year interval IST program plan interval for up to one year.

If you have any questions or require additional information regarding this matter, please contact Mr. GV Cullen, Licensing Supervisor, at (509) 377-6105.

Respectfully,



WS Oxenford  
Vice President, Technical Services  
Mail Drop PE04

Attachments: 1) Third Ten-Year Interval Inservice Testing Program Plan  
2) CD-ROM containing referenced Piping and Instrumentation Drawings

cc: BS Mallett – NRC RIV (w/o attach. 2)  
BJ Benney – NRC NRR (w/o attach. 2)  
NRC Senior Resident Inspector/988C (w/o attach. 1 or 2)  
RN Sherman – BPA/1399 (w/o attach. 1 or 2)  
WA Horin – Winston & Strawn (w/o attach. 1 or 2)