

November 30, 2005
GO2-05-186

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

Subject: **COLUMBIA GENERATING STATION, DOCKET NO. 50-397
SUPPLEMENT TO THE LICENSE AMENDMENT REQUEST FOR A ONE-
TIME CHANGE TO TECHNICAL SPECIFICATIONS**

Reference: Letter GO2-05-145, dated August 17, 2005, from WS Oxenford (Energy Northwest) to NRC, "License Amendment Request for One-time Extension of the Completion Time for Condition B of Technical Specification 3.7.1 and Exemption from Note 1 of Required Action B.1"

Dear Sir or Madam:

Transmitted herewith in Attachment 1 is supplemental information regarding the referenced License Amendment Request (LAR). A telecom between the NRC and Energy Northwest discussing this supplement was conducted on November 29, 2005. This supplemental information clarifies issues involving the "cascading" of the Service Water subsystem outage into the Diesel Generator Technical Specification (TS).

A revised mark-up of the proposed TS note and the associated TS Bases are provided in Attachment 2 and 3, respectively.

No new commitments are made in this submittal.

This supplemental information does not impact the original no significant hazards determination or the risk assessment used to justify the requested amendment. If you have any questions or require additional information, please contact Michael Brandon (509) 377-4758.

Energy Northwest requests the approval of this LAR on or before December 8, 2005.

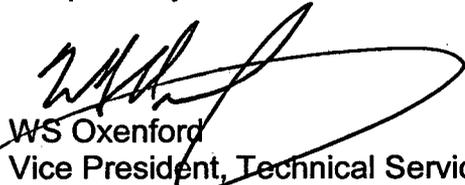
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**SUPPLEMENT TO THE LICENSE AMENDMENT REQUEST FOR A ONE-TIME
CHANGE TO TECHNICAL SPECIFICATIONS**

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I declare under penalty of perjury that the foregoing is true and correct. Executed on the date of this letter.

Respectfully,



WS Oxenford
Vice President, Technical Services
Mail Drop PE04

Attachments: 1. Supplemental Information
2. Revised mark-up of TS 3.7.1 and 3.8.1
3. Revised mark-up of TS Bases 3.7.1 and 3.8.1

cc: BS Mallett – NRC RIV
BJ Benney – NRC NRR
NRC Senior Resident Inspector/988C
RN Sherman – BPA/1399
WA Horin – Winston & Strawn

**SUPPLEMENT TO THE LICENSE AMENDMENT REQUEST FOR A ONE-TIME
CHANGE TO TECHNICAL SPECIFICATIONS**

Attachment 1

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SUPPLEMENTAL INFORMATION

Background

The referenced submittal requested an amendment to Operating License NPF-21 for Columbia Generating Station (Columbia). The requested amendment revised the Completion Time (CT) for the Required Action of Condition B of Technical Specification (TS) 3.7.1, "Standby Service Water (SW) System and Ultimate Heat Sink (UHS)," from 72 to 144 hours, on a one-time basis and allowed a one-time exemption from Note 1 of the Required Action 3.7.1.B.1.

As discussed in the referenced submittal, the exemption from Note 1 of Required Action B.1 of TS 3.7.1 was requested to avoid entering the Required Action B of TS 3.8.1 "AC Sources Operating" for the diesel generator (DG) supported by the inoperable SW B subsystem. Based on further discussions with the NRC Staff, Energy Northwest has reconsidered this path and is proposing a revision to the CT of both TS 3.7.1 and 3.8.1 on a one-time basis.

A revised marked-up copy of proposed change to the TS is provided in Attachment 2.

Upon approval of the proposed license amendment, Energy Northwest will implement a change to the applicable TS Bases.

A revised marked-up copy of proposed change to the TS Bases is provided in Attachment 3.

**SUPPLEMENT TO THE LICENSE AMENDMENT REQUEST FOR A ONE-TIME
CHANGE TO TECHNICAL SPECIFICATIONS**

Attachment 2

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Revised Mark-up of TS 3.7.1 and 3.8.1

(pages 3.7.1-2 and 3.8.1-3)

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>B. One SW subsystem inoperable.</p>	<p>B.1 -----NOTES-----</p> <ol style="list-style-type: none"> 1. Enter applicable Conditions and Required Actions of LCO 3.8.1, "AC Sources - Operating," for diesel generator made inoperable by SW System. 2. Enter applicable Conditions and Required Actions of LCO 3.4.9, "Residual Heat Removal (RHR) Shutdown Cooling System - Hot Shutdown," for RHR shutdown cooling subsystem made inoperable by SW System. <p>-----</p> <p>Restore SW subsystem to OPERABLE status.</p>	<p>72 hours *</p>

(continued)

* On a one-time basis, during the refurbishment/replacement of the 1B Service Water Pump during Cycle 18, the Completion Time for an inoperable service water subsystem is extended to 144 hours.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. (continued)	B.2 Declare required feature(s), supported by the inoperable DG, inoperable when the redundant required feature(s) are inoperable.	4 hours from discovery of Condition B concurrent with inoperability of redundant required feature(s)
	<u>AND</u>	
	B.3.1 Determine OPERABLE DG(s) are not inoperable due to common cause failure.	24 hours
	<u>OR</u>	
	B.3.2 Perform SR 3.8.1.2 for OPERABLE DG(s).	24 hours
	<u>AND</u>	
	B.4 Restore required DG to OPERABLE status.	72 hours  <u>AND</u> 6 days from discovery of failure to meet LCO

(continued)

 On a one-time basis, during the refurbishment/replacement of the 1B Service Water Pump during Cycle 18, the Completion Time for the Division 2 DG is extended to 144 hours.

**SUPPLEMENT TO THE LICENSE AMENDMENT REQUEST FOR A ONE-TIME
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Attachment 3

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Revised Mark-up of TS Bases 3.7.1 and 3.8.1

(pages B 3.7.1-5 and B 3.8.1-12)

BASES (continued)

ACTIONS

A.1

With average sediment depth in either or both spray ponds ≥ 0.5 and < 1.0 ft, water inventory is reduced such that the combined cooling capability of both spray ponds may be less than required for 30 days of operation after a LOCA. Therefore, action must be taken to restore average sediment depth to < 0.5 ft. The Completion Time of 30 days is based on engineering judgement and plant operating experience and takes into consideration the low probability of a design basis accident occurring in this time period.

B.1

If one SW subsystem is inoperable, it must be restored to OPERABLE status within 72 hours. With the unit in this condition, the remaining OPERABLE SW subsystem is adequate to perform the heat removal function. However, the overall reliability is reduced because a single failure in the OPERABLE SW subsystem could result in loss of SW function. The 72 hour Completion Time was developed taking into account the redundant capabilities afforded by the OPERABLE subsystem and the low probability of a DBA occurring during this period.

→ TP

The Required Action is modified by two Notes indicating that the applicable Conditions of LCO 3.8.1, "AC Sources - Operating," and LCO 3.4.9, "Residual Heat Removal (RHR) Shutdown Cooling System - Hot Shutdown," be entered and the Required Actions taken if the inoperable SW subsystem results in an inoperable DG or RHR shutdown cooling subsystem, respectively. This is in accordance with LCO 3.0.6 and ensures the proper actions are taken for these components.

C.1 and C.2

If the SW subsystem cannot be restored to OPERABLE status within the associated Completion Time, or both SW subsystems are inoperable, or the UHS is determined inoperable for reasons other than Condition A, the unit must be placed in a MODE in which the LCO does not apply. To achieve this

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On a one-time basis, during the refurbishment/ replacement of the 1B Service Water Pump during Cycle 18, the Completion Time for an inoperable service water subsystem is extended to 144 hours. The one-time extension is based upon a risk assessment performed in accordance with Regulatory Guides 1.174 and 1.177. During this extended Completion Time, administrative controls must be implemented to enhance the reliability of required electrical sources and to minimize plant activities that might challenge other safety-related equipment. This one-time extension expires at the end of Cycle 18.

BASES

ACTIONS

B.4 (continued)

the onsite Class 1E distribution system. The 72 hour Completion Time takes into account the capacity and capability of the remaining AC sources, a reasonable time for repairs, and the low probability of a DBA occurring during this period.

^H
The second Completion Time for Required Action B.4 established a limit on the maximum time allowed for any combination of required AC power sources to be inoperable during any single contiguous occurrence of failing to meet the LCO. If Condition B is entered while, for instance, an offsite circuit is inoperable and that circuit is subsequently restored OPERABLE, the LCO may already have been not met for up to 72 hours. This situation could lead to a total of 144 hours, since initial failure to meet the LCO, to restore the DG. At this time, an offsite circuit could again become inoperable, the DG restored OPERABLE, and an additional 72 hours (for a total of 9 days) allowed prior to complete restoration of the LCO. The 6 day Completion Time provides a limit on the time allowed in a specified condition after discovery of failure to meet the LCO. This limit is considered reasonable for situations in which Conditions A and B are entered concurrently. The "AND" connector between the 72 hour and 6 day Completion Times means that both Completion Times apply simultaneously, and the more restrictive Completion Time must be met.

Similar to Required Action B.2, the Completion Time of Required Action B.4 allows for an exception to the normal "time zero" for beginning the allowed outage time "clock." This exception results in establishing the "time zero" at the time the LCO was initially not met, instead of the time Condition B was entered.

C.1 and C.2

Required Action C.1 addresses actions to be taken in the event of concurrent failure of redundant required features. Required Action C.1 reduces the vulnerability to a loss of function. The Completion Time for taking these actions is reduced to 12 hours from that allowed with only one division without offsite power (Required Action A.2). The rationale

(continued)

On a one-time basis, during the refurbishment/ replacement of the 1B Service Water Pump during Cycle 18, the Completion Time for the Division 2 DG is extended to 144 hours. The one-time extension is based upon a risk assessment performed in accordance with Regulatory Guides 1.174 and 1.177. During this extended Completion Time, administrative controls must be implemented to enhance the reliability of required electrical sources and to minimize plant activities that might challenge other safety-related equipment. This one-time extension expires at the end of Cycle 18.