

March 20, 2006
GO2-06-042

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

**Subject: COLUMBIA GENERATING STATION, DOCKET NO. 50-397
REVISED TECHNICAL SPECIFICATION BASES CHANGE
(FOR INFORMATION) AND SUMMARY OF COMMITMENTS
ASSOCIATED WITH THE LICENSE AMENDMENT REQUEST FOR
EXTENSION OF DIESEL GENERATOR COMPLETION TIME**

- References:
- 1) Letter dated May 19, 2004, DK Atkinson (Energy Northwest) to NRC, "Application for Amendment of Facility Operating License No. NPF-21 for Extension of Diesel Generator Completion Time"
 - 2) Letter dated November 4, 2004, WA Macon (NRC) to JV Parrish (Energy Northwest), "Columbia Generating Station - Request for Additional Information (TAC No. MC3203)"
 - 3) Letter dated September 1, 2005, WS Oxenford (Energy Northwest) to NRC, "Response to Request for Additional Information Regarding License Amendment Request for Extension of Diesel Generator Completion Time"
 - 4) Letter dated January 9, 2006, WS Oxenford (Energy Northwest) to NRC, "Clarification of Response for Additional Information Regarding License Amendment Request for Extension of Diesel Generator Completion Time"
 - 5) Letter dated February 23, 2006, WS Oxenford (Energy Northwest) to NRC, "Clarification Regarding a Commitment Associated with the License Amendment Request for Extension of Diesel Generator Completion Time"

Dear Sir or Madam:

By Reference 1 Energy Northwest requested a change to Technical Specification (TS) 3.8.1, "AC Sources Operating," to permit a longer Completion Time for the Division 1 and Division 2 diesel generators (DG).

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**REVISED TECHNICAL SPECIFICATION BASES CHANGE (FOR INFORMATION) AND
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Page 2

By Reference 2 the NRC issued a Request for Additional Information (RAI) regarding the basis for the proposed change. By Reference 3 Energy Northwest responded to the RAIs.

On December 8, 2005, Energy Northwest met with NRC staff to discuss this amendment request. At that time NRC staff requested that certain items of discussion be clarified on the docket. This discussion is documented in Reference 4.

On February 14, 2006, during a conference call between the staff and Energy Northwest, the staff requested clarification of a commitment in Reference 4 associated with the cross-connection of our DG-3 diesel generator during a loss of offsite power or station blackout event. This clarification was provided in Reference 5.

The staff subsequently requested that a commitments summary, along with a revised Bases section to implement the cross-connection of DG-3 diesel generator be provided. Reference 3 provided the proposed TS change to LCO 4.2.1 and a Bases change (for Information) to implement the DG-3 cross-connect.

Attached is a revised Insert 2 for the proposed Bases and a summary of commitments associated with this request. The revised Bases incorporates the clarification of a previous commitment as described in Reference 3 (as clarified in Reference 4). The Summary of Commitments does not change any previously proposed commitments or contain any new commitments.

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

Respectfully,



DW Coleman
Manager, Regulatory Programs
Mail Drop PE20

Attachment 1: Revised Insert 2
Attachment 2: Summary of Commitments

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

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Attachment 1

Page 1 of 1

Insert 2

LCO 3.8.1 Action B.4. Bases

Page B-3.8.1-12 between paragraph 3 and paragraph 4

A second optional set of Actions is provided, that if the risk management actions for establishing the alternate AC sources to division 1 or division 2 (AACS) occurs within the 72 hours Completion Time limit, an extended Completion Time up to 14 days from the DG's initial inoperability is allowed. To establish the AACS, the DG-3 cross-connection to power selected safe shutdown loads is available and an additional AC source, a 480-volt diesel generator (DG-4), is staged and available. The AACS is considered available when DG-3 cross-connection can be implemented in accordance with the emergency procedures for a loss of offsite power or a station blackout event: within 2 hours and DG-4 can be aligned and supplying the battery chargers within 4 hours. Additional risk management actions in accordance with the configuration risk management program required by 10 CFR 50.65a(4) are to be put in place to assure that significant risk configurations are avoided during the extended DG inoperability.

Similar to Action A.3 Completion Time, when the 14-day extended Completion Time is applicable, the 17 day Completion Time provides a limit on the time allowed in a specified condition after discovery of failure to meet the LCO.

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Attachment 2
Page 1 of 3

Number	Location of Commitment	Summary of Commitments For Extended DG CT
1	Ref 1, Attachment 1, Page 18 Ref 3, RAI Response 16 & 18; Pages 46/47 & 53	The DG extended CT will not be entered for scheduled maintenance purposes if severe weather conditions are expected.
2	Ref 1, Attachment 1; Page 18 Ref 3, RAI Responses 16, 17, 18, 19a, & 19c; Pages 46, 47, 49, 51 & 52	The condition of the offsite power supply and transmission yard, including transmission lines and the stability of the Federal Columbia River Transmission System, will be evaluated through contact with the BPA dispatcher. If the grid stress conditions are high or forecasted to be high resulting in a significant potential for the grid to not be able to remain stable condition or supply post trip offsite power minimum voltages, the extended completion time will not be entered to perform elective maintenance. The BPA dispatcher will be contacted on at least a daily bases during the extended DG Completion Time to assure that conditions that create the potential for developing grid instabilities do not exist
3	Ref 1, Attachment 1; Page 18	No elective maintenance will be scheduled within the transformer yard that would challenge the TR-S or TR-B connections or offsite power availability during the proposed extended DG CT.
4	Ref 1, Attachment 1; Page 18	Operating crews will be briefed on the DG work plan, with consideration given to key procedural actions that would be required in the Loss Of Offsite Power (LOOP) or SBO.
5	Ref 1, Attachment 1; Page 18 Ref 3, RAI Responses 16, 19b; Pages 46/47& 51	While in the proposed extended DG CT, the following systems are risk significant during the extended DG CT period and will be protected so that elective maintenance and testing are not performed: Cross train DGs, their support systems, and their respective Service Water Systems TR-S and TR-B and the associated breakers and relay logic (protective and control) HPCS system RCIC system
6	Ref 3, RAI Response 19b; Page 51	Any testing and maintenance activities that must be performed while the extended DG CT is in effect, are required to have a 10 CFR 50.65(a)(4) evaluation performed

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Page 2 of 3

Number	Location of Commitment	Summary of Commitments For Extended DG CT
7	Ref 1, Attachment 1; Page 18 Ref 3, RAI Responses 16 & 19b; Pages 46/47 & 54	While in the proposed extended DG CT, additional elective equipment maintenance or testing that requires any other risk significant equipment to be removed from service will be evaluated and activities that yield unacceptable results will be avoided.
8	Ref 1, Attachment 1; Page 18	Emergent conditions that result in the protected systems being challenged will be managed to minimize the risk impact.
9	Ref 3, RAI Responses 1 & 2; Pages 2-10	Incorporate modeling and PRA Documentation changes identified in Level C F&Os (Nos. 1-4 and 6-14) and the modeling improvements to the fault trees of HPCS and RCIC into the next PRA upgrade.
10	Ref 3, RAI Response 7; Page 16	<p>The battery capacity will be verified prior to entry into the extended Completion Time by the following:</p> <ul style="list-style-type: none"> • The results of the last battery capacity surveillance was greater than or equal to 100% • The battery surveillances are current <p>Short time excursions in battery parameters outside surveillance limits will not invalidate the risk management compensatory measure commitment as specific TS Actions exist to restore the conditions within a reasonable time.</p> <p>A restraint in the battery load calculation, maintains the 6 hour capability for the PRA basis.</p>
11	Ref 3, RAI Responses 4 & 16; Page 12 & 41	For planned maintenance, DG-4 and DG-3 cross connect will be verified to be available and any associated surveillance procedures are current prior to taking the DG out of service. For emergent conditions (repair), DG-4 and DG-3 will be verified to be available as soon as practicable, but prior to exceeding 72 hours.
12	Ref 3, RAI Responses 3, 7, 10, 12, 16; Pages 12, 16, 17, 30-34, 41	Incorporate the administrative controls on the use of DG-3 and DG-4 into the SBO procedure, including the required load shedding of Division 1 and 2 125 volt batteries, the specific configuration of floor fans and door alignments used in the thermal calculation,

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Page 3 of 3

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		and configuration of the buses to facilitate the energizing of their use. Also provide a section for isolating the Division 1 or 2 bus and re-energizing the HPCS system. Procedures will be completed and training provided prior to entry into the extended DG CT.
13	Ref 3, RAI Responses 3 & 4; Pages 12 & 13	Perform the periodic Surveillance and maintenance procedures for verifying DG-4 is able to perform its risk management function. Procedures will be issued and training provided prior to entry into the extended DG CT.
14	Ref 3, RAI Response 17; Page 50	Revise planning procedures to obtain the projected grid conditions when planning an online elective DG maintenance. Assure that periods of stable grid conditions are chosen and that planning of maintenance activities by BPA on the grid are coordinated with DG outage planning to avoid conflict.
15	Ref 3, RAI Response 13; Page 37	Establish performance criteria for DG-4 in accordance with the Maintenance Rule requirements. The development of these performance criteria will be based on assumptions used in the PRA and updated in accordance with the PRA update program.
16	Ref 3, RAI Response 16; Page 42	Verify through training and simulation the ability to accomplish the energizing of the cross connection from DG-3 to the Division 1 or Division 2 ESF switchgear bus (SM-7 or SM-8 respectively) within 2 hours in accordance with the SBO Procedure.
17	Ref 4, Attachment 1; Page 3 Ref 5, Attachment	Establish procedures that during entry into the extended DG CT to direct full implementation of the DG-3 cross connect to Division 1 or Division 2 switchgear (SM-7 or SM-8) within two hours of a LOOP or SBO unless plant conditions dictate otherwise.
18	Ref 4, Attachment 2; Page 1	Establish procedures to implement the Columbia Fire Protection Program compensatory actions to restrict transient ignition sources and establish hourly fire tours in certain key fire areas during the DG extended completion time.