

September 11, 2006  
GO2-06-116

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

Subject: **COLUMBIA GENERATING STATION, DOCKET NO. 50-397  
REVISION TO PROPOSED CHANGES ASSOCIATED WITH LICENSE  
AMENDMENT REQUEST – ALTERNATIVE SOURCE TERM**

Reference: Letter dated September 30, 2004, DK Atkinson (Energy Northwest) to NRC,  
“License Amendment Request – Alternative Source Term”

Dear Sir or Madam:

In the referenced letter Energy Northwest provided a significant number of proposed changes to the Columbia Technical Specifications associated with the adoption of the Alternative Source Term. Included in the proposed changes were changes to Surveillance Requirement (SR) 3.6.4.1.1, SR 3.6.4.1.4, SR 3.6.4.1.5, and SR 3.6.4.3.3. The proposed changes to these SRs provided for an alternate means to ensure the quality and functionality of the secondary containment and the standby gas treatment (SGT) system. Recent telephone discussions between the NRC and Energy Northwest personnel have resulted in additional clarifications of the existing specifications and, therefore, Energy Northwest is proposing revisions to the changes identified in the reference.

As discussed in the referenced letter, following adoption of the Alternative Source Term credit for the filtration of the secondary containment effluents by the SGT system is not taken in the design basis loss of coolant accident analysis until the secondary containment pressure has been drawn down by the SGT system to a vacuum condition of at least 0.25 inches water gauge on all surfaces. The design basis drawdown time for Columbia is 20 minutes. However, the purpose of the SRs listed above (in conjunction with others) is to provide regular monitoring of the performance of the SGT subsystems and the secondary containment to ensure degradation in the performance of either is detected.

Regarding SR 3.6.4.1.1, Energy Northwest proposes to delete the change identified in the reference based on the understanding that this SR verifies the secondary containment boundary is being maintained in a sufficiently leak tight condition to preclude exfiltration

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## **REVISION TO PROPOSED CHANGES ASSOCIATED WITH LICENSE AMENDMENT REQUEST – ALTERNATIVE SOURCE TERM**

Page 2

under normal operating conditions. This is accomplished by verifying the indicated secondary containment pressure is greater than or equal to 0.25 inches of vacuum water gauge (Note: In this context, “greater” means more vacuum and greater pressure differential between the secondary containment and the environment). In addition, it is understood that the value of greater than or equal to 0.25 inches of vacuum water gauge is an indication of pressure at one location in the secondary containment and not a value maintained at every surface within the secondary containment. The instrument used to perform this surveillance measures pressure at reactor building elevation 572’ in an area that has open communication with the rest of the secondary containment volume. The use of 0.25 inches of vacuum water gauge includes margin to account for uncertainties. It is also understood that this SR is considered to be met during momentary perturbations of the secondary containment pressure (i.e., a transient that momentarily causes the pressure to be less than the SR acceptance criterion of 0.25 inches of vacuum water gauge) that are anticipated during routine operation of the plant (e.g., realignment of ventilation trains, opening and closing doors and hatches, and extreme wind gusts).

Regarding SR 3.6.4.1.4, Energy Northwest proposes to delete the change identified in the reference based on the understanding that this SR verifies that the SGT system will rapidly establish and maintain a pressure in the secondary containment that is less than the pressure external to the secondary containment boundary. This is accomplished by verifying the secondary containment can be drawn down to an indicated pressure of greater than or equal to 0.25 inches of vacuum water gauge in less than or equal to 120 seconds, following the start of a single SGT fan. In addition, it is understood that the value of greater than or equal to 0.25 inches of vacuum water gauge is an indication of pressure at one location in the secondary containment and not a value maintained at every surface within the secondary containment. The instrument used to perform this surveillance measures pressure at reactor building elevation 572’ in an area that has open communication with the rest of the secondary containment volume. The use of 0.25 inches of vacuum water gauge includes margin to account for uncertainties.

Regarding SR 3.6.4.1.5, Energy Northwest proposes to delete the change identified in the reference based on the understanding that this SR demonstrates that each SGT subsystem can maintain an indicated secondary containment pressure of greater than or equal to 0.25 inches of vacuum water gauge for one hour at an indicated flow rate of less than or equal to 2240 cfm. In addition, it is understood that the value of greater than or equal to 0.25 inches of vacuum water gauge is an indication of pressure at one location in the secondary containment and not a value maintained at every surface within the secondary containment. The instrument used to perform this surveillance measures pressure at reactor building elevation 572’ in an area that has open communication with the rest of the secondary containment volume. The use of 0.25 inches of vacuum water gauge includes margin to account for uncertainties.

These two tests (SR 3.6.4.1.4 and SR 3.6.4.1.5) verify the continuing ability of each SGT subsystem to achieve and maintain a vacuum in the secondary containment and, therefore, are used to assess secondary containment boundary integrity.

**REVISION TO PROPOSED CHANGES ASSOCIATED WITH LICENSE AMENDMENT  
REQUEST – ALTERNATIVE SOURCE TERM**

Page 3

Regarding SR 3.6.4.3.3, Energy Northwest proposes to delete the change identified in the reference based on the understanding that the existing requirement is adequate.

Upon approval of the Alternative Source Term Amendment Request, Energy Northwest intends to update the TS Bases to reflect these clarifications as part of the implementation process.

The original no significant hazards consideration included in the reference above is not affected by the information contained in this letter. In addition, there are no new commitments contained in this letter.

If you have any questions or require additional information, please contact Greg Cullen at (509) 377-6105.

Respectfully,



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