MEMORANDUM TO: David Terao, Branch Chief
Plant Licensing Branch IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

FROM: George Wilson, Branch Chief **/RA/**
Electrical Engineering Branch
Division of Engineering
Office of Nuclear Reactor Regulation

SUBJECT: COLUMBIA GENERATING STATION - REQUEST FOR ADDITIONAL INFORMATION (RAI) - REMOVAL OF OPERATING MODE RESTRICTIONS FOR PERFORMING EMERGENCY DIESEL GENERATOR SURVEILLANCE TESTING (TAC NO. MD2113)

By letter dated May 22, 2006, Energy Northwest (the licensee) requested an amendment to the Columbia Generating Station Technical Specifications. The proposed change would revise several of the Surveillance Requirements pertaining to the Division 3 emergency diesel generator to allow testing during Modes 1, 2, or 3.

Electrical Engineering Branch has reviewed the proposed request and finds that additional information is needed to complete its evaluation. Enclosed is a set of RAIs that should be transmitted to the licensee. Please note that these RAIs were informally e-mailed to Brian Benney of your staff earlier.

Enclosure: As stated

CONTACT: Sheila Ray, NRR/EEEA
(301) 415-1437

November 1, 2006

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DATE	10/27/06	10/31/06	11/01/06

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REQUEST FOR ADDITIONAL INFORMATION
ENERGY NORTHWEST
COLUMBIA GENERATING STATION
DOCKET NO. 50-397

1. Since performance of Surveillance Requirements (SRs) 3.8.11, 3.8.12 and 3.8.19 require de-energization of emergency buses, justify how performing these SR during power operation would not cause any significant perturbation to the electrical distribution system. In addition, describe how the Loss of offsite Power (LOOP) and Emergency Core Cooling Signal (ECCS) signals are generated without disturbing power operation.

2. Section 4.4 of the submittal states that in comparison with Diesel Generator (DG)-1 or DG-2, DG-3 has smaller loads associated with it i.e., high pressure core system (HPCS). There is less potential for testing of DG-3 to create a perturbation on the grid than there is with DG-1 or DG-2. Provide a list of loads that are normally powered by the DG-1, DG-2, and DG-3 buses. Section 4.4 also states that DG-3 test results show that important bus voltage parameters stay within prescribed limits. However, the staff notes that these tests were conducted during shutdown. Justify that the bus voltage would remain within limits when performing these SRs at power operation.

3. The staff notes that during the performance of SR 3.8.11, the HPCS pump is not started. Describe how this surveillance satisfies the requirement of GDC-18 which requires that the testing should be performed under conditions as close to design as practical. Also, provide justification for not starting the HPCS pump as required by this SR.

4. Section 4.5 of the submittal states that the control logic associated with DG-3 will be temporarily modified to prevent an actual injection into the reactor pressure vessel during the performance of SR 3.8.19. Describe in detail how the control circuitry is modified and what precautions are taken to ensure that the HPCS system is reverted back to its original configuration.

ENCLOSURE