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

Subject: **COLUMBIA GENERATING STATION, DOCKET NO. 50-397 NOTIFICATION OF DEVIATION FROM BOILING WATER REACTOR VESSEL INTERNALS PROJECT (BWRVIP) PROGRAM ELEMENT**

Reference: Letter dated May 30, 1997, Carl Terry (Chairman, BWRVIP) to Brian Sheron (NRC), "BWR Utility Commitments to the BWRVIP"

Dear Sir or Madam:

This letter is to notify the NRC of a deviation from a BWRVIP program element. This is a notification only and no action from the NRC is being requested. This notification is provided in accordance with the goals, objectives, and products of the agreements between the BWRVIP organization and the NRC described in the referenced letter.

The BWRVIP Program implementation guidelines provide guidance to ensure the consistent application of BWRVIP guidelines by member utilities. When Energy Northwest does not implement any portion of an applicable "mandatory" or "needed" BWRVIP guideline that has been approved by the BWRVIP Executive committee, we will notify the NRC and BWRVIP within 45 days following our approval of the deviation's disposition.

The deviation is from a "needed" element of the BWRVIP program. The needed element is maintaining copper concentrations in reactor feedwater in accordance with BWRVIP-130 "BWR Vessel and Internals Project, BWR Water Chemistry Guidelines - 2004 Revision."

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BWRVIP Document	BWRVIP Requirement	Exception	Alternate in Lieu of
BWRVIP-130 BWR Water Chemistry Guidelines - *2004 Revision*	Table 6-6, specifies the copper level for Action Level 1 to be 0.2 ppb. Also in Chapter 5 of the Guidelines, it states that for fuel performance considerations, a feedwater limit of <0.1 ppb is highly desirable.	Columbia has an admiralty brass condenser and condensate filter/ demineralizer system. The combination of these two systems only allows the feedwater copper level to be controlled at less than 0.35 ppb.	Maintain a feedwater copper limit of < 0.35 ppb.

Operating experience at Columbia demonstrates fuel integrity will not be compromised with feedwater copper levels above 0.2 ppb. Periodic fuel inspections will continue in order to identify any effects from the elevated limit on copper.

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

Respectfully,

D. W. Coleman

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