

February 22, 2007
GO2-07-034

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

Subject: **COLUMBIA GENERATING STATION, DOCKET NO. 50-397
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION
REGARDING RELIEF REQUEST 3ISI-07**

Reference: Letter, dated December 15, 2005, GO2-05-196, WS Oxenford (Energy Northwest) to NRC, "Submittal of the Third Ten-Year Interval Inservice Inspection Program Plan and 10 CFR 50.55a Requests 3ISI-01 Through 3ISI-07 for Columbia Generating Station"

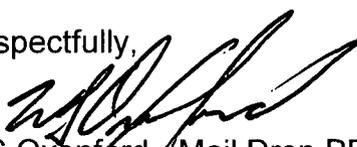
Dear Sir or Madam:

In the referenced letter Energy Northwest submitted its Third Ten-Year Interval Inservice Inspection Program Plan and 10 CFR 50.55a Requests 3ISI-01 through 3ISI-07 for Columbia Generating Station. To complete the Staff's review, additional information was requested regarding request 3ISI-07. Attached hereto is the response to the request for additional information and a revised relief request 3ISI-07 which was discussed with your staff during a teleconference on 11/07/2006. There are no new commitments contained in this response.

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

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

Respectfully,


WS Oxenford (Mail Drop PE04)
Vice President, Technical Services

Attachments: 1. Response to Request for Additional Information
2. Revised Request 3ISI-07

cc: BS Mallett – NRC RIV
CF Lyon – NRC NRR
NRC Senior Resident Inspector/988C

RN Sherman – BPA/1399
WA Horin – Winston & Strawn

A1047

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Response to Request for Additional Information

NRC Question 1

The licensee requested relief from the requirements of IWF-5200(a) and (b), and IWF-5300(a) and (b). IWF-5200(a) and IWF-5300(a) require that snubber pre-service and inservice examinations be performed in accordance with ASME/OM, Part 4 (OM-4), using the VT-3 visual examination method described in IWA-2213. Explain how the requirements of VT-3 will be met and/or how the alternative method used by Columbia is compatible to the VT-3, visual examination method described in IWA-2213.

Columbia Response:

Snubber support structures will continue to be examined by VT-3 qualified persons using the visual examination method described in IWA-2213. Qualification of personnel performing snubber assembly (pin to pin inclusive) examination is ensured by Energy Northwest's quality assurance program. Visual examination of snubber assemblies is performed as described in section (c) of the Bases for Licensee Controlled Specification (LCS) SR 1.7.3.1. This visual examination method is compatible to IWA-2213.

NRC Question 2

The licensee requested relief from the requirements of IWF-5200(a) and (b), and IWF-5300(a) and (b). In the "Proposed Alternative and Basis for Use," Section the licensee states that the requirements for snubber examination and testing detailed in Technical Specifications or in the LCS are similar to those specified in the ASME OM Code Subsection ISTD. Please explain the following:

- 2a. The licensee states that the requirements for snubber examination and testing is detailed in Technical Specifications. The current Columbia Technical Specifications does not contain any requirements related to snubbers.
- 2b. Relief is requested from the IWF-5200(a) & (b), and IWF-5300(a) & (b), whereas the licensee states that the Licensee Controlled Specification is similar to those specified in the ASME OM Code Subsection ISTD. (Note: the licensee is not asking relief from ISTD.)

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Columbia Response:

2a

Snubber examination and testing requirements are not detailed in Technical Specifications. The requirements are delineated in the LCS Requirement for Operability 1.7.3. Section 5, paragraph 3 in the proposed relief request 3ISI-07 is revised as follows:

“The requirements for snubber examination and testing detailed in the Licensee Controlled Specifications Requirement for Operability 1.7.3 are similar to those specified in Section XI.”

2b

Section 5, paragraph 3 in the proposed relief request 3ISI-07 is revised to remove the reference to ASME OM Code Subsection ISTD.

NRC Question 3

Columbia's LCS Bases B 1.7.3.1(e), "Functional Tests," states that during the first refueling shutdown and at least once per 24 months thereafter during shutdown, a representative sample of snubbers shall be tested using one of the following sample plans. The sample plan shall be selected prior to the test period and cannot be changed during the test period. The NRC Regional Administrator shall be notified in writing of sample plan selected prior to the test period or sample plan used in prior test period shall be implemented: (1) At least 10 percent of the total of each type of snubber or (2) A representative sample of 37 snubbers....Please provide the following information:

- 3a. Please provide the basis that allows the single plan to be changed before the start of every test period instead of every 10-year interval.
- 3b. Please explain the difference between test period (time) and refueling outage (once per 24 months).

Columbia Response:

3a

This requirement was specified in the previous Technical Specifications (pre-Improved Technical Specifications). The previous Technical Specification requirements were relocated into LCS without any changes.

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3b

There is no difference between the test period (time) and the refueling outage (once per 24 months). The test frequency, as specified in section (e) of the LCS Bases B 1.7.3.1 is once per 24 months during refueling outages. This is the period in time in which the testing is performed.

NRC Question 4

37 Testing Sample Plan: Paragraph 3.2.3.2(b) states that for any snubber(s) determined to be unacceptable as a result of testing, an additional random sample of at least one-half the size of the initial sample lot shall be tested. Explain how the requirements of Section 3.2.3.2(b) will be met, if the 37 testing sample plan is used.

Columbia Response:

The testing plan described in section (e) 2 of the Bases for LCS SR 1.7.3.1, requires snubber testing in accordance with Figure B 1.7.3-1. It requires the following equation to be satisfied:

$$C = .055n - 2.007 \quad \text{or} \quad n = 36.49 + 18.18C$$

Where:

C = the total number of snubbers found not meeting the functional test acceptance criteria.

and

n = the cumulative number of snubbers of a type tested.

This is the same as the Paragraph 3.2.3.2(b) requirement.

NRC Question 5

“Inservice Examination Failure Evaluation” Section 2.3.4 of OM-4 states that snubbers not meeting examination and acceptance criteria shall be evaluated to determine the cause of unacceptability. Explain how the requirements of Section 2.3.4 will be met.

Columbia Response:

The functional test failure analysis is described in section (g) of the Bases for LCS SR 1.7.3.1. Adherence to LCS SR 1.7.3.1 satisfies the requirements of Section 2.3.4 of OM-4.

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Revised Relief Request

10 CFR 50.55a Request Number 3ISI-07

Revision 1

Proposed Alternative

In Accordance with 10 CFR 50.55a(a)(3)(i)

--Alternative Provides Acceptable Level of Quality and Safety--

1. ASME Code Component(s) Affected

ASME Code Class 1, 2, and 3 safety related snubbers. The snubbers are listed in Section 6.0, Table 6-1.

2. Applicable Code Edition and Addenda

ASME Section XI 2001 Edition through 2003 Addenda.

3. Applicable Code Requirement

IWF-5200(a) Preservice examinations shall be performed in accordance with ASME/ANSI OM, Part 4, using the VT-3 visual examination method described in IWA-2213.

IWF-5200(b) Preservice tests shall be performed in accordance with ASME/ANSI OM, Part 4.

IWF-5300(a) Inservice examinations shall be performed in accordance with ASME/ANSI OM, Part 4, using the VT-3 visual examination method described in IWA-2213.

IWF-5300(b) Inservice tests shall be performed in accordance with ASME/ANSI OM, Part 4.

4. Reason for Request

The reason for this request is to eliminate duplicate snubber examination and test requirements of ASME Section XI and Licensee Controlled Specifications. Snubber examinations and tests are currently performed per Columbia's Licensee Controlled Specifications 1.7.3 and B 1.7.3. The surveillance requirements are the same as the previous (pre-improved Technical Specifications) Technical Specification 3/4.7.4.

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5. Proposed Alternative and Basis for Use

The snubber examination and test boundary will consist of the snubber assembly. Snubber examinations and tests will be performed per Columbia's Licensee Controlled Specifications 1.7.3 and B 1.7.3. Personnel performing snubber examinations and testing will be qualified in accordance with the Energy Northwest's quality assurance program.

ASME Section XI examination boundary of a support containing a snubber will not include the snubber assembly (pin to pin inclusive). The Section XI boundary will continue to be inspected under examination category F-A by the VT-3 method.

Repair/replacement activities on snubbers will continue to be performed in accordance with Section XI.

The requirements for snubber examination and testing detailed in the Licensee Controlled Specifications Requirement for Operability 1.7.3 are similar to those specified in Section XI.

Title 10 CFR 50.55a(b)(3)(v) states, "Subsection ISTD, Article IWF-5000, "Inservice Inspection Requirements for Snubbers," of the ASME BPV Code, Section XI, provides inservice inspection requirements for examinations and tests of snubbers at nuclear power plants. Licensees may use Subsection ISTD, "Inservice Testing of Dynamic Restraints (Snubbers) in Light-Water Reactor Power Plants," ASME OM Code, 1995 Edition through the latest edition and addenda incorporated by reference in paragraph (b)(3) of this section, in place of the requirements for snubbers in Section XI, IWF-5200(a) and (b) and IWF-5300(a) and (b), by making appropriate changes to their technical specifications or licensee-controlled documents. Preservice and inservice examinations must be performed using the VT-3 visual examination method described in IWA-2213."

The above rulemaking allows examination and testing of snubbers per the latest NRC approved ASME OM Code edition and addenda.

ASME Section XI on March 3, 2005 approved ballot BC 04-608 that revises Section XI to delete references to snubber testing and eliminates duplication with the ISTD requirements for snubber inspections. This ballot further clarifies jurisdiction boundaries between the two Codes and eliminates VT-3 requirements for the examination of snubber assembly (pin to pin inclusive).

The proposed alternative will reduce duplication of snubber examination requirements between Section XI and Energy Northwest's snubber program that is based on the Licensee Controlled Specifications. The proposed alternative will replace the test and examination requirements of IWF-5200 and IWF-5300 with the test and examination

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requirements contained in Energy Northwest's snubber program. Granting the proposed alternative as described herein provides an acceptable level of quality and safety, and does not adversely impact the health and safety of the public.

6. Duration of Proposed Alternative

The duration of this alternative is for the entire third ISI inspection interval ending December 12, 2015.

7. Precedents

The NRC has approved a similar request for Columbia's previous ten year inspection interval.

The NRC authorized this relief request by letter GI2-96-195, dated August 1, 1996, Nuclear Regulatory Commission to Mr. J.V. Parrish, "Inservice Inspection Program Relief Request for Snubber Inspections for the Washington Public Power Supply System (WPPSS) Nuclear Project No. 2 (WNP-2) (TAC No. M94580)"

8. References

ASME BPV Code, Section XI Ballot BC04-608.