September 15, 2008

Mr. J. V. Parrish
Chief Executive Officer
Energy Northwest
P.O. Box 968 (Mail Drop 1023)
Richland, WA 99352-0968

SUBJECT: COLUMBIA GENERATING STATION - ISSUANCE OF AMENDMENT RE: ADOPTION OF APPROVED GENERIC TECHNICAL SPECIFICATION CHANGES ASSOCIATED WITH CONTAINMENT ISOLATION VALVES (TAC NO. MD6208)

Dear Mr. Parrish:

The U.S. Nuclear Regulatory Commission (NRC, Commission) has issued the enclosed Amendment No. 208 to Facility Operating License No. NPF-21 for the Columbia Generating Station. The amendment consists of changes to the Technical Specifications (TSs) in response to your application dated July 30, 2007 (Agencywide Document Access and Management System (ADAMS) Accession No. ML072220075), as supplemented by letter dated August 28, 2008.

The amendment revises TSs 3.3.3.1, “Post Accident Monitoring (PAM) Instrumentation,” 3.3.6.1, “Primary Containment Isolation Instrumentation,” 3.6.1.3, “Primary Containment Isolation Valves (PCIVs),” and 3.6.4.2, “Secondary Containment Isolation Valves (SCIVs).” The proposed changes adopt the following TS Task Force (TSTF) Travelers that have been previously approved by the NRC: TSTF-45-A, Revision 2, "Exempt Verification of CIVs [containment isolation valves] that are Not Locked, Sealed or Otherwise Secured," TSTF-46-A, Revision 1, "Clarify the CIV Surveillance to Apply Only to Automatic Isolation Valves,” TSTF-207-A, Revision 5, "Completion Time for Restoration of Various Excessive Leakage Rates," TSTF-269-A, Revision 2, "Allow Administrative Means of Position Verification for Locked or Sealed Valves," TSTF-295-A, Revision 0, "Modify Note 2 to Actions of PAM Table to Allow Separate Condition Entry for Each Penetration," TSTF-306-A, Revision 2, "Add Action to LCO [limiting condition for operation] 3.3.6.1 to Give Option to Isolate the Penetration," and TSTF-323-A, Revision 0, "EFCV [excess flow check valve] Completion Time to 72 Hours."

A copy of the related Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's next biweekly *Federal Register* notice.

Sincerely,

/RA/

Carl F. Lyon, Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-397

Enclosures: 1. Amendment No.208 to NPF-21
2. Safety Evaluation

cc w/encls: See next page

A copy of the related Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's next biweekly *Federal Register* notice.

Sincerely,
/RA/

Carl F. Lyon, Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-397

Enclosures: 1. Amendment No.208 to NPF-21
2. Safety Evaluation

cc w/encls: See next page

DISTRIBUTION:

PUBLIC	RidsNrrDorlDpr	RidsOgcRp	RidsNrrDssScvb
LPLIV Reading	RidsNrrDorlLpl4	RidsRgnMailCenter	
RidsAcrsAcnw&mMailCenter	RidsNrrPMFLyon	BLee, NRR/DSS	
RidsNrrDirsItsb	RidsNrrLAGLappert	GHill, OIS (2)	

*memo dated

ADAMS Accession No.: Pkg. ML081900496 Amendment ML081900507,License/TS Pgs ML081900598

OFFICE	LPL4/PM	LPL4/LA	SCVB/BC	ITSB/BC	OGC	NRR/LPL4/BC	LPL4/PM
NAME	FLyon	GLappert	RDennig(*)	RElliott	RvHolmes	MMarkley	FLyon
DATE	9/2/08	9/2/	6/17/08	9/3/08	9/11/08	9/12/08	9/12/08

OFFICIAL RECORD COPY

cc:
Chairman
Energy Facility Site Evaluation Council
P.O. Box 43172
Olympia, WA 98504-3172

Mr. Gregory V. Cullen
Manager, Regulatory Programs
Energy Northwest
P.O. Box 968, Mail Drop PE20
Richland, WA 99352-0968

Chairman
Benton County Board of Commissioners
P.O. Box 190
Prosser, WA 99350-0190

Mr. William A. Horin, Esq.
Winston & Strawn
1700 K Street, N.W.
Washington, DC 20006-3817

Mr. Matt Steuerwalt
Executive Policy Division
Office of the Governor
P.O. Box 43113
Olympia, WA 98504-3113

Ms. Lynn Albin
Washington State Department of Health
P.O. Box 7827
Olympia, WA 98504-7827

Technical Services Branch Chief
FEMA Region X
130 - 228th Street, SW
Bothell, WA 98021-9796

Mr. Mike Hammond
Department of Homeland Security
FEMA/REP
130 - 228th Street SW
Bothell, WA 98021-9796

Regional Administrator, Region IV
U.S. Nuclear Regulatory Commission
612 E. Lamar Blvd., Suite 400
Arlington, TX 76011-4125

Senior Resident Inspector
U.S. Nuclear Regulatory Commission
P.O. Box 69
Richland, WA 99352-0069

Mr. Ken Niles
Assistant Director
Oregon Department of Energy
625 Marion Street NE
Salem, OR 97301-3737

Special Hazards Program Manager
Washington Emergency Management Div.
127 W. Clark Street
Pasco, WA 99301

ENERGY NORTHWEST

DOCKET NO. 50-397

COLUMBIA GENERATING STATION

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 208
License No. NPF-21

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by Energy Northwest (licensee), dated July 30, 2007, as supplemented by letter dated August 28, 2008, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's regulations set forth in 10 CFR Chapter I;

   B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;

   C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;

   D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and

   E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and Paragraph 2.C.(2) of Facility Operating License No. NPF-21 is hereby amended to read as follows:

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. The license amendment is effective as of its date of issuance and shall be implemented within 90 days from the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

Michael T. Markley, Chief
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment: Changes to the Facility
Operating License No. NPF-21
and Technical Specifications

Date of Issuance: September 15, 2008

ATTACHMENT TO LICENSE AMENDMENT NO. 208

FACILITY OPERATING LICENSE NO. NPF-21

DOCKET NO. 50-397

Replace the following pages of the Facility Operating License No. NPF-21 and Appendix A, Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain vertical lines indicating the areas of change.

Facility Operating License

REMOVE	INSERT
-3-	-3-

Technical Specification

REMOVE	INSERT
3.3.3.1-4	3.3.3.1-4
3.3.6.1-1	3.3.6.1-1
3.3.6.1-8	3.3.6.1-8
3.6.1.3-1	3.6.1.3-1
3.6.1.3-2	3.6.1.3-2
3.6.1.3-3	3.6.1.3-3
3.6.1.3-4	3.6.1.3-4
3.6.1.3-5	3.6.1.3-5
3.6.1.3-6	3.6.1.3-6
3.6.1.3-7	3.6.1.3-7
3.6.1.3-8	3.6.1.3-8
3.6.1.3-9	3.6.1.3-9
---	3.6.1.3-10
3.6.4.2-2	3.6.4.2-2
3.6.4.2-3	3.6.4.2-3
---	3.6.4.2-4

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 208 TO

FACILITY OPERATING LICENSE NO. NPF-21

ENERGY NORTHWEST

COLUMBIA GENERATING STATION

DOCKET NO. 50-397

1.0 INTRODUCTION

By application dated July 30, 2007 to the U.S. Nuclear Regulatory Commission (NRC) (Agencywide Documents Access and Management System (ADAMS) Accession No. ML072220075), as supplemented by letter dated August 28, 2008, Energy Northwest (the licensee) requested changes to the Technical Specifications (TSs) for the Columbia Generating Station (CGS). The requested changes revise TSs 3.3.3.1, “Post Accident Monitoring (PAM) Instrumentation,” 3.3.6.1, “Primary Containment Isolation Instrumentation,” 3.6.1.3, “Primary Containment Isolation Valves (PCIVs),” and 3.6.4.2, “Secondary Containment Isolation Valves (SCIVs).” The proposed changes adopt the following TS Task Force (TSTF) Travelers that have been previously approved by the NRC: TSTF-45-A, Revision 2, "Exempt Verification of CIVs [containment isolation valves] that are Not Locked, Sealed or Otherwise Secured," TSTF-46-A, Revision 1, "Clarify the CIV Surveillance to Apply Only to Automatic Isolation Valves,” TSTF-207-A, Revision 5, "Completion Time for Restoration of Various Excessive Leakage Rates," TSTF-269-A, Revision 2, "Allow Administrative Means of Position Verification for Locked or Sealed Valves," TSTF-295-A, Revision 0, "Modify Note 2 to Actions of PAM Table to Allow Separate Condition Entry for Each Penetration," TSTF-306-A, Revision 2, "Add Action to LCO [limiting condition for operation] 3.3.6.1 to Give Option to Isolate the Penetration," and TSTF-323-A, Revision 0, "EFCV [excess flow check valve] Completion Time to 72 Hours."

The requested changes are related to primary and secondary containment isolation and were chosen by the licensee to increase the consistency between the CGS TSs and the Improved Standard Technical Specifications (ISTS).

The supplement dated August 28, 2008, provided additional information that clarified the application, did not expand the scope of the application originally noticed, and did not change the NRC staff original proposed no significant hazards consideration determination as published in the *Federal Register* on August 28, 2007 (72 FR 49573).

2.0 REGULATORY EVALUATION

Section 50.36 of Part 50 of Title 10 of the *Code of Federal Regulations* (10 CFR 50.36) is the Commission's regulatory requirement that TSs are needed and that TSs are required to include items in five specific categories related to facility operation. Paragraph 50.36(d)(2)(ii) of 10 CFR, "Technical specifications," requires that "[a] technical specification limiting condition for operation of a nuclear reactor must be established for each item meeting one or more of the [criteria set forth in 10 CFR 50.36(d)(2)(ii)(A)-(D)]." Paragraph 50.36(d)(3) of 10 CFR requires that TSs include surveillance requirements, which "are requirements relating to test, calibration, or inspection to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions for operation will be met."

The CGS containment systems are designed to prevent and mitigate the release of fission products to the environment during and after a design-basis accident. If a fission product release to the environment does occur, the design of the containment is such that the exposure limits of Title 10 of the *Code of Federal Regulation* (10 CFR) Part 100, will not be exceeded. Containment isolation mechanisms such as valves and blind flanges serve as a barrier between fluids inside and outside the containment. The licensee's proposed TS changes pertain to containment isolations valves that are designed to be shut during accident conditions.

10 CFR Part 50, Appendix A, "General Design Criteria For Nuclear Power Plants," provides the minimum requirements for the principle design criteria for water-cooled nuclear power plants such as CGS. Specifically, General Design Criteria (GDC) 16 "Containment Design," GDC 50 "Containment Design Basis," GDC 54 "Piping Systems Penetrating Containment," and GDC 56 "Primary Containment Isolation" contain the requirements for the containment and related systems.

In June 2004, the NRC published a set of Standard Technical Specifications (STS) in NUREG-1433, Revision 3, "Standard Technical Specifications, General Electric Plants, BWR/4" and NUREG-1434, Revision 3, "Standard Technical Specifications, General Electric Plants, BWR/6. The STS are a guide to what a plant's TS should contain with regard to format and content. The STS are not requirements in a regulatory sense, but licensees adopting portions of the improved STS to existing TS should adopt all related requirements, as applicable, to achieve a high degree of standardization and consistency.

The adoption of the following TSTFs are proposed within the scope of this amendment request:

> TSTF-45-A, Revision 2, Exempt Verification of Containment Isolation Valves that are Not Locked, Sealed or Otherwise Secured, July 26, 1999.
>
> TSTF-46-A, Revision 1, Clarify the Containment Isolation Valves Surveillance to Apply Only to Automatic Isolation Valves, March 13, 1997.
>
> TSTF-207-A, Revision 5, Completion Time for Restoration of Various Excessive Leakage Rates, March 24, 2000.

TSTF-269-A, Revision 2, Allow Administrative Means of Position Verification for Locked or Sealed Valves, July 27, 1999.

TSTF-295-A, Revision 0, Modify Note 2 to Actions of Post Accident Monitoring Table to Allow Separate Condition Entry for Each Penetration, December 21, 1999.

TSTF-306-A, Revision 2, Add Action to LCO 3.3.6.1 to Give Option to Isolate the Penetration, July 13, 2000.

TSTF-323-A, Revision 0, Excess Flow Check Valve Completion Time to 72 hours, March 22, 1999.

3.0 TECHNICAL EVALUATION

The proposed changes to the CGS TS associated with the adoption of TSTF-45-A, TSTF-46-A, TSTF-207-A, TSTF-269-A, TSTF-295A, TSTF-306-A, and TSTF-323-A are evaluated individually below.

3.1 TSTF-45-A, Revision 2, "Exempt Verification of Containment Isolation Valves that are Not Locked, Sealed or Otherwise Secured"

TSTF-45-A was developed to propose changes to Surveillance Requirements (SR) 3.6.1.3.3 and SR 3.6.1.3.4 of TS 3.6.1.3 and SR 3.6.4.2.1 of TS 3.6.4.2 within the ISTS for manual PCIVs and SCIVs and blind flanges located both inside and outside containment, by adding a provision to exempt from position verification requirements containment isolation valves (CIVs) that are locked, sealed, or otherwise secured.

The CGS-specific TS equivalent to ISTS (NUREG-1433) SR 3.6.1.3.3 is SR 3.6.1.3.2 and the equivalent to ISTS (NUREG-1433) SR 3.6.1.3.4 is SR 3.6.1.3.3. The licensee is proposing to make changes associated with the adoption of TSTF-45-A, which would revise SR 3.6.1.3.2 and 3.6.1.3.3 of TS 3.6.1.3 and SR 3.6.4.2.1 of TS 4.6.4.2 to exempt PCIVs and SCIVs from position verification if the valves are locked, sealed, or otherwise secured in position. The proposed changes require an update to the TS Bases.

Since the SR are intended to ensure that valves that could be inadvertently repositioned remain isolated, it is not necessary to check the CIVs that are locked, sealed, or otherwise secured as they were verified to be in the correct position upon being locked, sealed, or otherwise secured. Therefore, these changes are acceptable. In addition, specifying that only CIVs which are not locked, sealed, or otherwise secured are required to be verified closed is consistent with other CGS SR such as SR 3.1.7.5 (Standby Liquid Control System Valves), SR 3.5.1.2 (Emergency Core Cooling System Valves), SR 3.5.3.2 (Reactor Core Isolation Cooling Valves), SR 3.6.1.5.1 (Residual Heat Removal Drywell Spray System Valves), and SR 3.7.1.3 (Service Water System and Ultimate Heat Sink Valves).

3.2 TSTF-46-A, Revision 1, “Clarify the Containment Isolation Valves Surveillance to Apply Only to Automatic Isolation Valves”

TSTF-46-A was developed to propose changes to SR 3.6.1.3.6 of TS 3.6.1.3 and SR 3.6.4.2.2 of TS 3.6.4.2 of the ISTS to clarify that the verification of isolation time is only applicable to power operated, automatic isolation valves, not to all power operated and all automatic isolation valves.

The TS Bases for SR 3.6.1.3.6 and 3.6.4.2.2 of the ISTS, state that the isolation time test ensures the valve will isolate in a time period less than or equal to that assumed in the safety analysis. There are valves credited as PCIVs and SCIVs which are power operated (i.e., can be remotely operated), but that do not receive a containment isolation signal. These power operated valves do not have an isolation time assumed in the accident analyses since they require operator action. Therefore, deleting the reference to time testing power operated isolation valves that are not automatic valves serves to reduce the potential for misinterpretation of these SR while verifying compliance with the assumptions in the accident analyses.

The CGS-specific TS equivalent to ISTS (NUREG-1433) SR 3.6.1.3.6 is SR 3.6.1.3.5. The licensee is proposing to make changes associated with the adoption of TSTF-46-A, which would revise SR 3.6.1.3.5 of TS 3.6.1.3 and SR 3.6.4.2.2 of TS 3.6.4.2 to clarify that the verification of isolation time is only applicable to power operated, automatic isolation valves, not to all power operated and all automatic isolation valves. The proposed changes require an update to the TS Bases.

The changes proposed for the corresponding PCIV and SCIV SR in CGS TS 3.6.1.3 and 3.6.4.2 conform to the changes made to the ISTS by this traveler. These changes only clarify the intended scope of containment isolation valves covered by these existing surveillances, and hence are administrative. Because the current scope of these surveillances has not changed, there is no impact of safety. Therefore, these changes are acceptable.

3.3 TSTF-207-A, Revision 5, “Completion Time for Restoration of Various Excessive Leakage Rates”

TSTF-207-A was developed to revise Condition D to address leakage types other than only secondary containment bypass leakage rate, such as main steam isolation valve (MSIV) leakage, purge valve leakage, leakage from hydrostatically tested valves, and excess flow check valve (EFCV) leakage. Prior to TSTF-207-A, if an MSIV hydrostatically tested valve, or EFCV did not meet leakage limits, condition A would be entered. Condition A allows the penetration to be isolated but does not require the leakage rate to be restored to within the limit. TSTF-207-A modified Condition D to be applicable to all measured leakage rates and requires restoration of the leakage to within limit.

The licensee is proposing to make changes associated with the adoption of TSTF-207-A, which would incorporate editorial changes to the actions of TS 3.6.1.3 to be consistent with the typical presentation of condition exceptions and to make the terminology in the conditions and completion time consistent. The changes proposed for Condition A, B, and C are editorial changes to reference Condition D instead of referring to leakage not within limits. The proposed change to Condition D of TS 3.6.1.3 would revise the wording from “One or more penetration

flow paths with secondary containment bypass leakage rate, MSIV leakage rate, hydrostatically tested lines leakage rate not within limit" to "One or more secondary containment bypass leakage rate, MSIV leakage rate, hydrostatically tested lines leakage rate not within limit," eliminating the phrase "penetration flow paths with." The proposed changes require an update to the TS Bases.

The change would make the CGS TS consistent with the ISTS. The completion times in Condition D are revised to provide a separate completion time for each type of leakage and the completion times revised to be consistent with the ISTS. In addition, the completion time is revised to refer to "MSIV Leakage" instead of "main steam line," so that the completion time and the condition are worded consistently. Therefore, these changes are acceptable.

3.4 TSTF-269-A, Revision 2, "Allow Administrative Means of Position Verification for Locked or Sealed Valves"

TSTF-269-A was developed to propose changes to requirements for repetitive verification of the status of locked, sealed, or secured components by allowing verification to be by administrative means. The purpose of the periodic verification that a penetration with an inoperable isolation valve continues to be isolated is to detect and correct inadvertent repositioning of the isolation device. However, the function of locking, sealing, or securing an isolation device ensures that the device is not advertently repositioned. Therefore, it is sufficient to assume that the initial establishment of component status (e.g., isolation valves closed) was performed correctly and subsequent periodic re-verification need only be a verification of the administrative control that ensures that the component remains in the required state.

The licensee is proposing to make changes associated with the adoption of TSTF-269-A, which would modify TS 3.6.1.3 and TS 3.6.4.2. Both TS 3.6.1.3 and TS 3.6.4.2 require that penetrations with an inoperable isolation valve be isolated and periodically verified to ensure continued isolation. A note would be added to TS 3.6.1.3, Actions A and C, and TS 3.6.4.2, Action A to allow isolation devices that are locked, sealed, or otherwise secured to be verified by use of administrative means. The proposed changes require an update to the TS Bases.

The notes being added to the corresponding PCIV and SCIV action requirements in CGS TS 3.6.1.3 and 3.6.4.2 conform to the changes made to the ISTS by this traveler. Administrative controls for such valves have proven to be adequate to ensure that the valves are maintained in the positions required by the plant safety analyses when primary and secondary containment are required to be operable. Therefore, allowing the position of locked, sealed, or otherwise secured valves to be verified by administrative means is acceptable.

3.5 TSTF-295-A, Revision 0, "Modify Note 2 to Actions of Post Accident Monitoring Table to Allow Separate Condition Entry for Each Penetration"

TSTF-295 was developed to propose that Function 7 of TS 3.3.3.1 within the ISTS be renamed from "PCIV Position" to "Penetration Flow Path PCIV Position." The proposed change is a clarification which identifies that separate condition entry is allowed for each penetration flow path for the PAM PCIV position indication function and clarifies how to apply the Actions note to this function. The actions note states "Separate condition entry is allowed for each function." The changes clarify that a separate condition entry is allowed for each penetration flow path for

the PAM PCIV position indication function. This change was intended to provide consistency between the PCIV position indication function of the PAM TS (TS 3.3.3.1) and the allowance in the primary containment penetration TS for PCIVs (TS 3.6.1.3). The PAM specification requires a minimum of one channel of PCIV position indication in the control room to be operable for each active PCIV in a containment penetration flow path. Actions provide appropriate compensatory actions for each inoperable indication channel. The change is intended to reduce the potential for a shutdown of the unit due to misinterpretation of the requirements.

The licensee is proposing to make a change associated with the adoption of TSTF-295-A, which would rename Function 7 of TS 3.3.3.1 from "PCIV Position" to "Penetration Flow path PCIV Position." This proposed change requires an update to the TS Bases.

This change is administrative because it will clarify the intended application of action requirements for inoperable channels of the PAM function and is consistent with the action requirements for PCIVs. It does not reduce any existing action requirements for the PAM function and does not affect plant safety. Therefore, the proposed change to this function is acceptable.

3.6 TSTF-306-A, Revision 2, "Add Action to LCO 3.3.6.1 to Give Option to Isolate the Penetration"

TSTF-306-A was developed to modify TS 3.3.6.1 within the ISTS by adding an action note to allow penetration flow paths to be unisolated intermittently under administrative controls. TS 3.6.1.3 contains an allowance to open PCIVs intermittently under administrative controls. The isolation instrumentation described in TS 3.3.6.1 serves as a support system for the PCIVs. The actions for inoperability of the instrumentation should not be more restrictive than the actions for inoperability of the PCIVs. Therefore, the allowance to intermittently open penetrations (under administrative control) that are isolated to comply with actions is added to TS 3.3.6.1 actions as Note 1.

Additionally, TSTF-306 proposed that the traversing incore probe (TIP) isolation system be segregated as a separate isolation function with the associated action allowing penetration isolation rather than a unit shutdown. The actions for inoperable primary containment isolation instrumentation, require a unit shutdown and is overly restrictive for inoperable TIP isolation instrumentation. Therefore, the option to isolate the penetration and to continue plant operation is provided. The TIP system uses a small bore penetration, and its isolation in a design basis event is via the manually operated shear valves. The ability to manually isolate the TIP system by either the normal isolation valve or the shear valve would be unaffected by inoperable instrumentation. Therefore, the option to isolate the penetration and to continue plant operation was provided. In order to implement this allowance, a separate isolation instrumentation function is proposed for the TIP system. The completion time to isolate the penetration (Action G) of 24 hours is the completion time provided in the ISTS for penetration isolation when the manual isolation function is inoperable.

The licensee proposes to make changes associated with the adoption of TSTF-306-A, which would revise TS 3.3.6.1. An action note would be added to allow penetration flow paths to be unisolated intermittently under administrative controls. Additionally, the TIP isolation system

would be segregated as a separate function, allowing 24 hours to isolate the penetration. The proposed changes require an update to the TS Bases.

The changes proposed for corresponding containment isolation instrumentation functions in CGS TS 3.3.6.1 conform to the changes made to the ISTS by this traveler. The proposed changes to establish explicit instrumentation function LCOs and associated action requirements for the TIP system isolation are acceptable because they are consistent with other containment isolation valve manual isolation instrumentation function requirements. The revised requirements would ensure that adequate measures to maintain plant safety are taken in the event this instrumentation is inoperable. Unit shutdown is overly restrictive because the inoperability affects only the TIP system isolation.

The Action required for TIP system containment isolation instrumentation inoperability is the same as for inoperable manual isolation (i.e., isolate the penetration in 24 hours). The TIP system penetration is a small bore (approximately ½ inch) and is isolated in a design-basis event by manually operated shear valves. The ability to manually isolate the TIP system by either the normal isolation valve or the shear valve would be unaffected by the inoperable instrumentation. Therefore, the same action as for manual isolation instrumentation functions provides an appropriate level of safety and isolation instead of a plant shutdown.

Because plant operation would be allowed in this condition, the proposed actions note clarifies that penetrations isolated to comply with actions may be opened intermittently under administrative controls. This condition is acceptable because the administrative controls would ensure timely closure of the penetration if an event occurs that requires isolating the primary containment.

3.7 TSTF-323-A, Revision 0, “Excess Flow Check Valve Completion Time to 72 hours”

TSTF-323-A was developed to modify Action C of TS 3.6.1.3 within the ISTS to extend the completion time for excess flow check valves (EFCV) from 12 hours to 72 hours. Certain BWR designs include a class of single-isolation valve penetrations (i.e., instrumentation lines with an EFCV). Approved TSTF-30-A, Revision 3, “Extend the Completion Time for Inoperable Isolation Valve to a Closed System to 72 hours,” extended the completion time to 72 hours for inoperable CIVs where there was only a single valve on the containment penetration for those penetrations that meet the requirements of GDC 57. TSTF-30-A was approved by the NRC in a letter dated August 16, 1999. The NRC approval was based on recognition that these penetrations were designed with some other acceptable barrier (e.g., closed system). EFCVs similarly are on penetrations that have been found to have acceptable barrier(s) in the event that the single isolation valve failed. Therefore, Required Action C.1 was revised to provide a completion time of 72 hours for inoperable EFCVs.

The licensee is proposing to make changes associated with the adoption of TSTF-323-A, which would revise Action C of TS 3.6.1.3 to provide a 72 hour completion time instead of a 12 hour completion time to isolate an inoperable EFCV. The proposed changes require an update to the TS Bases.

The changes proposed for corresponding PCIV and EFCV action requirements in CGS

TS 3.6.1.3 conform to the changes made to the ISTS by this traveler. The BWR/4 design includes a class of single-isolation valve penetrations (i.e., instrumentation lines with an EFCV) that were inadvertently not included in the markup for TSTF-30, Revision 3. That approved traveler extended the completion time to 72 hours for inoperable PCIVs in containment penetration flow paths with just one PCIV. This change is acceptable because these single-PCIV penetrations are used in closed systems that provide an acceptable second barrier. Similarly, EFCVs are installed on penetrations that provide acceptable barriers in the event that the single isolation valve failed. The completion time of 72 hours for inoperable EFCVs is acceptable for the reasons stated above.

3.8 Conclusion

Based on the evaluation above, the NRC staff finds the licensee's proposed TS changes to be acceptable. In addition, the NRC staff has no objections to the licensee's proposed changes to the TS Bases.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Washington State official was notified of the proposed issuance of the amendment. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration and there has been no public comment on such finding published in the *Federal Register* on August 28, 2007 (72 FR 49573). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: B. Lee

Date: September 15, 2008