

June 9, 2010

Mr. W.S. Oxenford, Senior Vice President,  
Generation and Chief Nuclear Officer  
Columbia Generating Station  
Energy Northwest  
MD PE08  
P.O. Box 968  
Richland, WA 99352

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION FOR THE REVIEW OF THE  
COLUMBIA GENERATING STATION, LICENSE RENEWAL APPLICATION –  
SCOPING AND SCREENING METHODOLOGY

Dear Mr. Oxenford:

By letter dated January 19, 2010, Energy Northwest submitted an application pursuant to Title 10 of the *Code of Federal Regulations* Part 54 (10 CFR Part 54), to renew operating license NPF-21 for Columbia Generating Station, for review by the U.S. Nuclear Regulatory Commission (NRC or the staff). The staff is reviewing the information contained in the license renewal application and has identified, in the enclosure, areas where additional information is needed to complete the review. Further requests for additional information may be issued in the future.

Items in the enclosure were discussed with Abbas Mostala and a mutually agreeable date for the response is within 30 days from the date of this letter. If you have any questions, please contact me at 301-415-4029 or by e-mail at [evelyn.gettys@nrc.gov](mailto:evelyn.gettys@nrc.gov).

Sincerely,

*/RA/*

Evelyn Gettys, Project Manager  
Projects Branch 1  
Division of License Renewal  
Office of Nuclear Reactor Regulation

Docket No. 50-397

Enclosure:  
As stated

cc w/encl: See next page

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Evelyn Gettys, Project Manager  
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COLUMBIA GENERATING STATION  
LICENSE RENEWAL APPLICATION  
REQUEST FOR ADDITIONAL INFORMATION

**RAI 2.1-1**

Background

10 CFR 54.4, "Scope," states, in part,

(a) Plant systems, structures, and components within the scope of this part are –

- (1) Safety-related systems, structures, and components (SSCs) which are those relied upon to remain functional during and following design-basis events (as defined in 10 CFR 50.49 (b)(1)) to ensure the following functions –
  - (i) The integrity of the reactor coolant pressure boundary;
  - (ii) The capability to shut down the reactor and maintain it in a safe shutdown condition; or
  - (iii) The capability to prevent or mitigate the consequences of accidents which could result in potential offsite exposures comparable to those referred to in 10 CFR 50.34(a)(1), 10 CFR 50.67(b)(2), or 10 CFR 100.11, as applicable.
- (2) All nonsafety-related systems, structures and components whose failure could prevent satisfactory accomplishment of any of the functions identified in (a)(1)(i), (ii), or (iii) of this section.

(A) Issue

During the scoping and screening methodology audit, performed onsite May 10-13, 2010, the staff reviewed the license renewal application (LRA) and 10 CFR 54.4(a) implementing documents and had discussions with the applicant. The staff determined that the applicant had identified safety-related components and cables located in the turbine building. The applicant had performed an evaluation, as documented in license renewal implementing documents and reports, that concluded that the nonsafety-related SSCs in the proximity of, or attached to, the safety-related components and cables were not required to be included within the scope of license renewal because the safety-related components and cables had been evaluated to be fail-safe.

Request

The staff requests that the applicant provide the details of the evaluation and basis for the conclusion that nonsafety-related SSC's, in the proximity of or attached to safety-related components and cables, are not required to be included within the scope of license renewal in accordance with 10 CFR 54.4(a)(2).

Describe any additional scoping evaluations performed to address the 10 CFR 54.4(a) criteria. List any additional SSCs that were included within the scope of license renewal as a result of the reviews discussed in this RAI. List the structure and component types subject to aging management review, aging management review results and aging management programs, as applicable, to be credited for managing the identified aging effects.

(B) Issue

During the scoping and screening methodology audit, performed onsite May 10-13, 2010, the staff reviewed the LRA and 10 CFR 54.4(a) implementing documents and had discussions with the applicant. The applicant indicated that additional nonsafety-related SSCs, with the potential to spatially interact with safety-related SSCs, had been identified and would be included within the scope of license renewal in accordance with 10 CFR 54.4(a)(2). The nonsafety-related SSCs are located in corridors between buildings and were identified by the applicant during walkdowns performed subsequent to the issuance of the LRA and prior to the scoping and screening methodology audit and had not been identified in the LRA.

Request

The staff requests that the applicant perform a review of the scoping methodology (as described in the LRA) and indicate why the methodology or its implementation precluded the identification of the nonsafety-related SSCs to be included within the scope of license renewal in accordance with 10 CFR 54.4(a)(2) prior to the issuance of the LRA.

Describe any changes to the scoping methodology (as described in LRA) or its implementation, that resulted in the identification of additional nonsafety-related SSCs, not previously identified in the LRA, to be included within the scope of license renewal in accordance with 10 CFR 54.4(a)(2).

Describe any additional scoping evaluations performed to address the 10 CFR 54.4(a) criteria. List any additional SSCs that were included within the scope of license renewal as a result of the reviews discussed in this RAI. List the structure and component types subject to aging management review, aging management review results and aging management programs, as applicable, to be credited for managing the identified aging effects.

(C) Issue

During the scoping and screening methodology audit, performed onsite May 10-13, 2010, the staff reviewed the LRA and 10 CFR 54.4(a) implementing documents and had discussions with the applicant. The applicant discussed the bounding conditions (as described in NEI 95-10, Appendix F) that had been used to identify the portion of nonsafety-related pipe, attached to safety-related SSCs, to be included within the scope of license renewal in accordance with 10 CFR 54.4(a)(2). The staff determined that the use of some bounding conditions had not been described in the LRA.

### Request

The staff requests that the applicant discuss all bounding conditions used to identify the portion of nonsafety-related pipe, attached to safety-related SSCs, to be included within the scope of license renewal in accordance with 10 CFR 54.4(a)(2).

### **RAI 2.1.1.2.2-1**

#### Background

Section 2.1.1.2.2 of the Columbia Generating Station LRA, "Spatial Failures of Non-safety Related SSCs," describes the methodology used for scoping SSCs for spatial interaction per the criteria of 10 CFR 54.4(a)(2). As described, all fluid-containing components within an entire structure were included in the scope of license renewal if that building also contained safety related SCCs.

#### Issue

During plant walkdowns for the scoping and screening audit, several components were chosen to spot check the scoping results. In the DG-1 room, the scoping of a floor drain on the 441 elevation was questioned and this drain line was found to not be in scope. Under the methodology described in the LRA, this line should have been scoped under 10 CFR 50.54(a)(2) for spatial interaction.

### Request

The NRC staff requests that the licensee provide additional information to address the scoping of this drain line.

### **RAI 2.1.1.2.2-2**

#### Background

Section 2.1.1.2.2 of the Columbia Generating Station LRA, "Spatial Failures of Non-safety Related SSCs," describes the methodology used for scoping SSCs for spatial interaction per the criteria of 10 CFR 54.4(a)(2). As described, all fluid-containing components within an entire structure were included in the scope of license renewal if that building also contained safety related SCCs.

#### Issue

During plant walkdowns for the scoping and screening audit, several components were chosen to spot check the scoping results. In the DG-1 room, the scoping of two drain lines from air handlers DMA-AH-11 and 12 were questioned. It was found that the scoping of these lines was not depicted on the license renewal boundary drawings or discussed in the application. However, a reference to the drain lines was discovered in the support material for AMP B.2.14, "Cooling Units Inspection."

Request

The NRC staff requests that the licensee provide additional information to confirm that these drain lines and drain lines from other air handlers in the diesel generator building are included in the scope of license renewal.

Letter to W.S. Oxenford from Evelyn Gettys dated June 9, 2010

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Columbia Generating Station

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