



ENERGY NORTHWEST

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10 CFR 50.90

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

**Subject: COLUMBIA GENERATING STATION, DOCKET NO. 50-397
SUPPLEMENTAL INFORMATION IN SUPPORT OF LICENSE
AMENDMENT REQUEST REGARDING CONTROL ROD OPERABILITY
AND CONTROL ROD SCRAM ACCUMULATORS**

Reference: 1) Letter GO2-10-024 dated February 8, 2010, WS Oxenford (Energy Northwest) to NRC, "License Amendment Request to Change Technical Specifications Relating to Control Rod Operability and Control Rod Scram Accumulators," (ADAMS Accession No. ML100490749)

Dear Sir or Madam:

By Reference 1, Energy Northwest submitted a License Amendment Request (LAR) for changes to the Columbia Generating Station (CGS) Technical Specifications (TS) involving Control Rod Operability and Control Rod Scram Accumulators. Via email, the NRC identified some discrepancies in how the effects of repagination were captured in the retyped TS pages.

This supplement provides the justification and corrections for the retyped TS pages. The enclosure to this letter contains all of the retyped TS (and Operating License) pages in support of the LAR.

Specific changes to the retyped TS pages previously submitted include the following:

- With the proposed changes to LCO 3.1.3, the information that previously was contained on TS pages 3.1.3-1 through 3.1.3-4, is now reflected on proposed TS pages 3.1.3-1 through 3.1.3-3. Consistent with this repagination, current TS page 3.1.3-5 will be renumbered to TS page 3.1.3-4, and TS page 3.1.3-5 will be removed from the TS.

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**SUPPLEMENTAL INFORMATION IN SUPPORT OF LICENSE AMENDMENT
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Page 2

- Proposed TS page 3.1.3-3 contains changes due to repagination, as indicated by a change bar at the bottom right hand corner of the page, vice the top of the page as previously submitted in Reference 1. The amendment 212 listing is also removed from this page, as the information listed on this page was not changed by that amendment.
- Amendment No. 205 is indicated as crossed out on the bottom of TS page 3.1.5-2.
- Proposed TS page 3.1.5-3 contains changes due to repagination, as indicated by a change bar at the bottom right hand corner of the page, vice the top of the page as previously submitted in Reference 1.

The information contained in this supplement does not impact the original determination of no significant hazards. There are no new commitments contained in this letter.

If you have any questions or require additional information, please contact DW Gregoire at 509-377-8616.

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

Respectfully,



W.S. Oxenford
Vice President, Nuclear Generation & Chief Nuclear Officer

Enclosure: Retyped Operating License and Technical Specification Pages

cc: NRC Region IV Administrator
NRC Project Manager
NRC Senior Resident Inspector/988C
RN Sherman – BPA/1399
WA Horin – Winston & Strawn
JO Luce – EFSEC
RR Cowley – WDOH

**SUPPLEMENTAL INFORMATION IN SUPPORT OF LICENSE AMENDMENT
REQUEST REGARDING CONTROL ROD OPERABILITY AND CONTROL ROD
SCRAM ACCUMULATORS**

Enclosure

Retyped Operating License and Technical Specification Pages

Operating License page

9b

Technical Specification pages

3.1.3-2

3.1.3-3 (pagination change only)

3.1.3-4 (pagination change only)

3.1.5-1

3.1.5-2

3.1.5-3 (pagination change only)

3.7.3-3

5.5-13

- (b) The first performance of the periodic assessment of CRE habitability, Specification 5.5.14.c.(ii), shall be within 3 years, plus the 9-month allowance of SR 3.0.2, as measured from November 6, 2003, the date of the most recent successful tracer gas test, or within the next 9 months if the time period since the most recent successful tracer gas test is greater than 3 years.
- (c) The first performance of the periodic measurement of CRE pressure, Specification 5.5.14.d, shall be within 24 months, plus the 184 days allowed by SR 3.0.2, as measured from March 23, 2006, the date of the most recent successful pressure measurement test, or within 184 days if not performed previously.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. (continued)	<p>A.3 Perform SR 3.1.3.2 for each withdrawn OPERABLE control rod.</p> <p><u>AND</u></p> <p>A.4 Perform SR 3.1.1.1.</p>	<p>24 hours from discovery of Condition A concurrent with THERMAL POWER greater than the low power setpoint (LPSP) of the RWM</p> <p>72 hours</p>
B. Two or more withdrawn control rods stuck.	B.1 Be in MODE 3.	12 hours
C. One or more control rods inoperable for reasons other than Condition A or B.	<p>C.1 -----NOTE----- RWM may be bypassed as allowed by LCO 3.3.2.1, if required, to allow insertion of inoperable control rod and continued operation. -----</p> <p>Fully insert inoperable control rod.</p> <p><u>AND</u></p> <p>C.2 Disarm the associated CRD.</p>	<p>3 hours</p> <p>4 hours</p>

(continued)

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>D. -----NOTE----- Not applicable when THERMAL POWER > 10% RTP. ----- Two or more inoperable control rods not in compliance with banked position withdrawal sequence (BPWS) and not separated by two or more OPERABLE control rods.</p>	<p>D.1 Restore compliance with BPWS. <u>OR</u> D.2 Restore control rod to OPERABLE status.</p>	<p>4 hours 4 hours</p>
<p>E. -----NOTE----- Not applicable when THERMAL POWER > 10% RTP. ----- One or more groups with four or more inoperable control rods.</p>	<p>E.1 Restore the control rod to OPERABLE status.</p>	<p>4 hours</p>
<p>F. Required Action and associated Completion Time of Condition A, C, D, or E not met. <u>OR</u> Nine or more control rods inoperable.</p>	<p>F.1 Be in MODE 3.</p>	<p>12 hours</p>

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.1.3.1 Determine the position of each control rod.	24 hours
SR 3.1.3.2 -----NOTE----- Not required to be performed until 31 days after the control rod is withdrawn and THERMAL POWER is greater than the LPSP of the RWM. ----- Insert each withdrawn control rod at least one notch.	31 days
SR 3.1.3.3 Verify each control rod scram time from fully withdrawn to notch position 5 is ≤ 7 seconds.	In accordance with SR 3.1.4.1, SR 3.1.4.2, SR 3.1.4.3, and SR 3.1.4.4
SR 3.1.3.4 Verify each control rod does not go to the withdrawn overtravel position.	Each time the control rod is withdrawn to "full out" position <u>AND</u> Prior to declaring control rod OPERABLE after work on control rod or CRD System that could affect coupling

3.1 REACTIVITY CONTROL SYSTEMS

3.1.5 Control Rod Scram Accumulators

LCO 3.1.5 Each control rod scram accumulator shall be OPERABLE.

APPLICABILITY: MODES 1 and 2.

ACTIONS

-----NOTE-----
Separate Condition entry is allowed for each control rod scram accumulator.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One control rod scram accumulator inoperable with reactor steam dome pressure \geq 900 psig.	A.1 -----NOTE----- Only applicable if the associated control rod scram time was within the limits of Table 3.1.4-1 during the last scram time Surveillance. ----- Declare the associated control rod scram time "slow."	8 hours
	OR A.2 Declare the associated control rod inoperable.	8 hours

(continued)

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>B. Two or more control rod scram accumulators inoperable with reactor steam dome pressure \geq 900 psig.</p>	<p>B.1 Restore charging water header pressure to \geq 940 psig.</p>	<p>20 minutes from discovery of Condition B concurrent with charging water header pressure < 940 psig</p>
	<p><u>AND</u></p> <p>B.2.1 -----NOTE----- Only applicable if the associated control rod scram time was within the limits of Table 3.1.4-1 during the last scram time Surveillance. -----</p>	
	<p>Declare the associated control rod scram time "slow."</p> <p><u>OR</u></p> <p>B.2.2 Declare the associated control rod inoperable.</p>	<p>1 hour</p> <p>1 hour</p>

(continued)

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>C. One or more control rod scram accumulators inoperable with reactor steam dome pressure < 900 psig.</p>	<p>C.1 Verify the associated control rod is fully inserted.</p> <p><u>AND</u></p> <p>C.2 Declare the associated control rod inoperable.</p>	<p>Immediately upon discovery of charging water header pressure < 940 psig</p> <p>1 hour</p>
<p>D. Required Action B.1 or C.1 and associated Completion Time not met.</p>	<p>D.1 -----NOTE----- Not applicable if all inoperable control rod scram accumulators are associated with fully inserted control rods. ----- Place the reactor mode switch in the shutdown position.</p>	<p>Immediately</p>

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>F. Two CREF subsystems inoperable during OPDRVs.</p> <p><u>OR</u></p> <p>One or more CREF subsystems inoperable due to inoperable CRE boundary during OPDRVs.</p>	<p>F.1 Initiate action to suspend OPDRVs.</p>	<p>Immediately</p>

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.7.3.1 Operate each CREF subsystem for ≥ 10 continuous hours with the heaters operating.</p>	<p>31 days</p>
<p>SR 3.7.3.2 Perform required CREF filter testing in accordance with the Ventilation Filter Testing Program (VFTP).</p>	<p>In accordance with the VFTP</p>

(continued)

5.5 Programs and Manuals

5.5.13 Battery Monitoring and Maintenance Program (continued)

- b. Actions to equalize and test battery cells that had been discovered with electrolyte level below the top of the plates; and
 - c. Actions to verify that the remaining cells are ≥ 2.07 V when a cell or cells have been found to be < 2.13 V.
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5.5.14 Control Room Envelope Habitability Program

A Control Room Envelope (CRE) Habitability Program shall be established and implemented to ensure that CRE habitability is maintained such that, with an OPERABLE Control Room Emergency Filtration (CREF) System, CRE occupants can control the reactor safely under normal conditions and maintain it in a safe condition following a radiological event, hazardous chemical release, or a smoke challenge. The program shall ensure that adequate radiation protection is provided to permit access and occupancy of the CRE under design basis accident (DBA) conditions without personnel receiving radiation exposures in excess of 5 rem total effective dose equivalent (TEDE) for the duration of the accident. The program shall include the following elements:

- a. The definition of the CRE and the CRE boundary.
- b. Requirements for maintaining the CRE boundary in its design condition including configuration control and preventive maintenance.
- c. Requirements for (i) determining the unfiltered air inleakage past the CRE boundary into the CRE in accordance with the testing methods and at the Frequencies specified in Sections C.1 and C.2 of Regulatory Guide 1.197, "Demonstrating Control Room Envelope Integrity at Nuclear Power Reactors," Revision 0, May 2003, and (ii) assessing CRE habitability at the Frequencies specified in Sections C.1 and C.2 of Regulatory Guide 1.197, Revision 0.

(continued)