ENERGY NORTHWEST

Bradley J. Sawatzke
Columbia Generating Station
P.O. Box 968, PE08
Richland, WA 99352-0968
Ph. 509.377.4300 | F. 509.377.4150
bjsawatzke@energy-northwest.com

March 3, 2011
GO2-11-047

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**
LICENSE AMENDMENT REQUEST TO DELETE OBSOLETE LICENSE CONDITIONS

Dear Sir or Madam:

Pursuant to 10 CFR 50.90, Energy Northwest hereby requests changes to Facility Operating License NPF-21 for the Columbia Generating Station (Columbia). The proposed administrative changes either delete or modify existing license conditions which have been completed or are otherwise no longer in effect. Energy Northwest has evaluated the proposed changes and has determined that a finding of "no significant hazards consideration" is justified based on the considerations herein: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation with the proposed changes to the Operating License and (2) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

The enclosure to this letter provides the basis for the each proposed license change and contains the following attachments:

- Attachment 1 provides the Operating License pages marked up to show the proposed changes.
- Attachment 2 provides the proposed Operating License changes in the final typed format.

Approval of the proposed changes to the Operating License is requested within one year from the date of this submittal to support the Columbia license renewal effort. Once approved, the amendment will be implemented within 30 days.

This letter and its enclosure contain no regulatory commitments.

A143
NRR

In accordance with 10 CFR 50.91, a copy of this application, with attachments, is being provided to the designated Washington State Official.

If you should have any questions regarding this submittal, please contact Mr. K. D. Christianson, Licensing Supervisor, at (509) 377-4315.

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

Respectfully,

B. J. Sawatzke
Vice President, Nuclear Generation & Chief Nuclear Officer

Enclosure: Evaluation of Proposed Changes

Attachments to the Enclosure:
1. Proposed Operating License Changes (mark-up)
2. Proposed Operating License Changes (retyped)

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

Evaluation of Proposed Change

Subject: License Amendment Request to Delete Obsolete License Conditions

ATTACHMENTS:

1. Proposed Operating License Changes (mark-up)
2. Proposed Operating License Changes (retyped)

1.0 SUMMARY DESCRIPTION

This evaluation supports an NRC request to amend Operating License NPF-21 in support of the License Renewal Application for Columbia Generating Station (Columbia). The proposed changes are administrative in nature and either delete or modify existing license conditions that have been completed or are otherwise no longer in effect. Approval of the proposed changes to the Operating License is requested within one year from the date of this submittal to support the Columbia license renewal effort.

2.0 DETAILED DESCRIPTION

Operating License NPF-21 was issued on December 20, 1983, to Washington Public Power Supply System (WPPSS) for the WPPSS Nuclear Project No. 2. WPPSS subsequently changed its name to Energy Northwest and changed the name of the plant to Columbia Generating Station.

Many conditional requirements were placed on the Operating License for Columbia to address outstanding licensing issues and facilitate issuance of the original Operating License. Since the original issuance of the Columbia Operating License, several additional requirements (license conditions) have been incorporated into the license via the license amendment process pursuant to 10 CFR 50.90. In some cases, subsequent license amendments have removed certain license conditions when they were no longer applicable. However, the majority of the license conditions have been left intact even though they are no longer required.

Energy Northwest is proposing an administrative change to the Columbia Operating License to remove those license conditions that no longer apply. This proposed Operating License "clean-up" activity also includes minor editorial changes for consistency.

Revision of the Columbia Operating License is being proposed to retain only those license conditions that remain pertinent to current station operations. The intent is to provide a license document for license renewal that does not contain unnecessary or obsolete requirements and that is directly applicable to the current plant design and licensing basis.

3.0 TECHNICAL EVALUATION

Each proposed change to the Operating License is described below including the justification for the change.

Proposed Change to Revise License Condition 2.C.(1) and Delete Attachment 1

License condition 2.C.(1) requires completion of items in Attachment 1 to the license. This attachment contains three types of items: 1) completion of preoperational/acceptance tests, 2) installation of hangers, supports, and restraints, and 3) construction completion (master completion list schedule). The reference to Attachment 1 in this license condition should be deleted along with the Attachment itself.

Justification for Deletion:

Item 1a requires completion of the System 36 preoperational testing prior to fuel load. System 36 (process radiation monitoring) testing was completed as required. Inspection Report 50-397-84-07 (Reference 1) discussed the completion of the required testing of System 36 prior to fuel load and identified this item as "Closed". Thus, this item has been satisfied and can be deleted.

Item 1b requires completion of 16 preoperational/acceptance tests prior to exceeding 5% rated power. By letter dated April 12, 1984 (Reference 2), Energy Northwest confirmed that all but two of the tests listed in Attachment 1 item 1b have been completed. The other two tests (PT 33.0-B and PT 92.0-A) were not required to be completed as described below. The Columbia Final Safety Analysis Report (FSAR) addresses the status of the two systems with incomplete testing. As such, Item 1b can be deleted.

- PT 33.0-B: By letter dated January 17, 1984 (Reference 3), Energy Northwest reported that the portions of the chemical waste system to be tested by PT 33.0-B have been suspended indefinitely and requested that test PT 33.0-B be removed from the list of preoperational/acceptance tests. A portable skid system was provided by Chemical Nuclear System Inc. to process wet, solid radioactive waste. The system was described in FSAR Amendment No. 33 and was approved by the NRC staff as documented in Supplement 4 to NUREG-0892 (Reference 4). By letter dated April 13, 1984 (Reference 5), the NRC provided their agreement with Energy Northwest's position of indefinitely suspending test PT 33.0-B but stated that prior to placing the permanent system into operation, this test must be completed. As such, this requirement is contained in section 11.2.2 of the Columbia FSAR which states that the chemical waste subsystem has been installed but will not be used until plant operating experience indicates a need and system testing is accomplished.

- PT 92.0-A: By letter dated April 12, 1984 (Reference 2), Energy Northwest described the status of the testing of the system stating that the test had been completed utilizing one of two redundant chillers. Subsequently, the off-gas charcoal adsorber vault refrigeration system was permanently deactivated, which has been documented in section 9.4.5 of the Columbia FSAR.

Item 1c requires completion of PT 22.0-B, Nitrogen Inerting System, prior to six months after initial criticality. By letter dated July 18, 1984 (Reference 6), Energy Northwest confirmed completion of the required testing. Thus, this item has been satisfied and can be deleted.

Item 2 requires completion of all hangers, supports, and restraints needing installation or modification prior to exceeding 5% rated power. By letter dated March 16, 1984 (Reference 7), Energy Northwest confirmed the completion of the required modifications. Inspection Report 50-397-84-04 (Reference 8) evaluated the installation of hangers, supports and restraints required prior to exceeding 5% rated power and identified no deviations or items of noncompliance. Thus, this license condition has been satisfied.

Item 3 requires completion of items on the Master Completion List (MCL) schedule dated December 19, 1983. The MCL identifies the various individual work items which were necessary for plant completion. The various items were categorized and scheduled for completion as follows: prior to fuel load, prior to initial pressurization with steam generated by nuclear heat, prior to 5% rated power, prior to commercial operation, or prior to completion of first refueling. A condition was inserted into the Operating License to assure NRC review of any planned reclassification of these items. Such reviews were conducted prior to fuel load, plant pressurization, 5% rated power level, commercial operation (defined as July 1, 1984), and at the first refueling outage as documented in NRC Inspection Reports 50-397-83-60, 50-397-84-18 and 50-397-86-18 (References 9-11, respectively). The NRC concluded that the actions required by this license condition have been satisfactorily completed. Thus, this item can be deleted.

Proposed Change to Delete License Condition 2.C.(3)

This license condition specifies that the Initial Test Program, as described in Section 14 of the FSAR, is to be conducted without making any modifications of this program unless such modifications are in accordance with 10 CFR 50.59. Furthermore, no major modifications to the test program are to be made without prior NRC approval.

Justification for Deletion: Startup testing of Columbia was completed in 1985. By letter dated April 17, 1985 (Reference 12), Energy Northwest submitted the final startup report. Inspection Reports 50-397-84-38 and 50-397-85-27 (References 13 and 14) documented the NRC review of the startup testing program. This license condition has been satisfied.

Proposed Change to Delete License Condition 2.C.(4)

This license condition requires completion of seismic qualification for all equipment that was approved by the NRC staff for interim operation. This qualification was required to be completed prior to startup following the first refueling outage.

Justification for Deletion: By letter dated June 3, 1986 (Reference 15), Energy Northwest confirmed that the seismic qualification of equipment required by this license condition is complete and this license condition has been satisfied.

Proposed Change to Delete License Condition 2.C.(5)

This license condition requires NRC review and approval of two items relating to equipment qualification: a) assurance that certain equipment is either environmentally qualified or justified for interim operation, and b) assurance that the "g" values for the as-installed configuration of pipe-mounted safety-related equipment do not exceed the "g" values established in the equipment qualification information documentation files or provide justification for continued operation. This qualification was required to be completed prior to exceeding 5% rated power.

Justification for Deletion: By letter dated September 16, 1983 (Reference 16), Energy Northwest submitted the environmental qualification report for safety-related equipment. By letter dated January 18, 1984 (Reference 17), Energy Northwest confirmed that the requirements of license condition 2.C.(5)(a) are satisfied. By letter dated January 23, 1984 (Reference 18), Energy Northwest confirmed the completion of the pipeline mounted equipment "g" value comparison program and that all differences are reconciled either by qualification documentation upgrade, piping analysis refinement, or plans for physical plant modifications. By letter dated March 16, 1984 (Reference 7), Energy Northwest confirmed the completion of required modifications. In Supplement 5 to NUREG-0892 (Reference 19), the NRC stated that license conditions 2.C.(5)(a) and (b) are satisfied.

Proposed Change to Delete License Condition 2.C.(6)

This license condition requires testing of the ultimate heat sink (UHS) spray ponds and NRC review and approval of the test results and conclusions. This testing was required to be completed prior to startup following the first refueling outage.

Justification for Deletion: By letter dated September 27, 1985 (Reference 20), Energy Northwest submitted the test results and conclusions to the NRC. By letter dated December 11, 1985 (Reference 21), the NRC provided their approval and stated that license condition 2.C.(6) is satisfied.

Proposed Change to Delete License Condition 2.C.(7)

This license condition requires development of a turbine system maintenance program based on the manufacturer's calculations of missile generation probabilities or a recurring inspection of the low pressure turbine rotors. NRC review and approval of the program is required. This condition was required to be satisfied within three years of the date of issuance of the license.

Justification for Deletion: By letter dated November 20, 1986 (Reference 22), Energy Northwest submitted the turbine system inspection schedule to the NRC, which was based upon the turbine manufacturer's (Westinghouse) criteria and topical report for estimating the probability of turbine disc rupture from stress corrosion cracking. It was noted that the inspection schedule and the time interval between inspections are subject to change depending on previous inspection results, existence or lack of flaws, equipment availability, and inspection refinements or techniques yet to be developed. By letter dated March 27, 1987 (Reference 23), the NRC stated that license condition 2.C.(7) is satisfied by 1) use of the Westinghouse methodology and procedures and 2) an existing commitment in FSAR section 3.5.1.3.4.3 in which Energy Northwest committed to reduce the inspection intervals for subsequent inspections if cracks are detected and measured at any inspection. In April 1992, the original Westinghouse shrunk-on-disc type low pressure (LP) rotors were removed and new Westinghouse Fully Integral LP rotors were installed. The current LP turbine missile analysis is based on Fully Integral rotors using the probabilistic method in WSTG-4NP. FSAR section 3.5.1.3.4.1 describes the current turbine inspection and testing intervals. Thus, this license condition has been satisfied.

Proposed Change to Delete License Condition 2.C.(8)

This license condition requires NRC review and approval of a revised analysis showing the effects of high burnup fission gas release on loss of coolant accidents (LOCA). This condition was required to be satisfied prior to startup following the first refueling outage.

Justification for Deletion: By letters dated February 4, 1986 (Reference 24) and May 9, 1986 (Reference 25), Energy Northwest submitted information supporting closure of license condition 2.C.(8). By letter dated May 23, 1986 (Reference 26), the NRC concluded that license condition 2.C.(8) is satisfactorily resolved. Thus, this license condition has been satisfied. The current approved LOCA models for Columbia are documented in FSAR sections 4.2.1.3 and 4.2.3.3 and Technical Specification (TS) 5.6.3.b.

Proposed Change to Delete License Condition 2.C.(9)

This license condition requires implementation of NRC requirements regarding additional instrumentation for detection of inadequate core cooling. Any required modifications were to be completed on a schedule acceptable to the NRC.

Justification for Deletion: As discussed in NUREG-0892 (Reference 66) the instrument in question is for measurement of reactor vessel water level. By letter dated November 27, 1984 (Reference 27), Energy Northwest submitted information supporting closure of license condition 2.C.(9). No modifications were deemed necessary. Inspection Report 50-397-84-38 (Reference 13) evaluated Energy Northwest's response to NUREG-0737 Item II.F.2 regarding inadequate core cooling and reactor vessel level instrumentation and identified this item as "Closed." Thus, this license condition has been satisfied. The instrumentation to measure reactor vessel water level is described in FSAR sections 7.2.1.1.3, 7.3.1.1.2.1, 7.5.1.1.1, and 7.7.1.1.2.2

Proposed Change to Delete License Condition 2.C.(10)

This license condition requires NRC review and approval of a revised stability analysis. This condition was required to be satisfied prior to startup following the first refueling outage.

Justification for Deletion: By letter dated January 27, 1986 (Reference 28), Energy Northwest submitted information supporting closure of license condition 2.C.(10) based upon NRC approval of Amendment 16. The TS changes authorized by this amendment satisfied the intent of the license condition. By letter dated March 21, 1986 (Reference 29), the NRC provided their concurrence. Thus, this license condition has been satisfied. The current approved stability analysis for Columbia is documented in FSAR sections 4.1.4.3 and 4.4.4.2 and TS 5.6.3.b.

License Condition 2.C.(11) and Proposed Changes to Portions of Attachment 3

Attachment 3 is referenced by license condition 2.C.(11) which requires completion of the construction of shield walls and a shield window. This attachment describes where the walls are to be located and when they are required to be installed. No changes are proposed to the actual license condition 2.C.(11). Portions of Attachment 3 are proposed to be deleted.

Justification for Change: Items 1 through 4 have been installed. Therefore, the first four items and the Note (*) are proposed for deletion. The installation of remaining items is conditional upon local area radiation levels and no change is requested for these items. (Note that references 67 and 68 provide the basis for deferral of installation of these shield walls. Those walls not yet installed are associated with the permanent radwaste solidification system, which is not utilized as documented in FSAR Figures 11.2-4 and 11.4-1. Also, FSAR section 11.4.2 describes the portable solid waste management system which is used in lieu of the permanent solidification system.) The FSAR figure numbers are proposed to be corrected to align with the current FSAR.

Proposed Change to Delete License Condition 2.C.(12)

This license condition requires installation of an alternate remote shutdown system. The installation was required to be completed prior to startup following the first refueling outage.

Justification for Deletion: By letters dated June 2, 1986 (Reference 30) and August 6, 1986 (Reference 31), Energy Northwest confirmed completion of the installation of the alternate remote shutdown system and provided a description of the as-installed system. Inspection Report 50-397-86-18 (Reference 32) documented the NRC observation of installation of the alternate remote shutdown system. This license condition has been satisfied. The alternate remote shutdown system is described in FSAR section 7.4.1.4. TS 3.3.3.2 and Licensee Controlled Specification (LCS) 1.3.3.3 address the remote shutdown system, which includes the alternate remote shutdown system as documented in the TS Bases and LCS Bases.

Proposed Change to Delete License Condition 2.C.(15)

This license condition requires that during the startup test program each shift have a licensed individual or advisor with previous startup or operating experience on a comparable boiling water reactor (BWR).

Justification for Deletion: By letter dated November 11, 1983 (Reference 33), Energy Northwest submitted the resumes of individuals with previous startup or licensed operating experience. In Supplement 4 to NUREG-0892 (Reference 4), the NRC noted that this condition was considered closed. By letter dated October 16, 1984 (Reference 34), Energy Northwest subsequently updated the list of individuals to be utilized to meet this requirement. Startup testing of Columbia was completed in 1985.

Proposed Change to Delete License Condition 2.C.(16) and Attachment 2

This license condition requires correction of control room design deficiencies and completion of emergency response capabilities as required by Attachment 2 to the license.

Justification for Deletion: All items in Attachment 2 have been completed as discussed below. In Supplement 5 to NUREG-0892 (Reference 19), the NRC stated that license conditions 2.C.(16) is satisfied.

- Item 1 requires submittal of a program plan for a detailed control room design review (DCRDR) within 2 months after issuance of the Operating License and a summary report not later than 6 months prior to the first refueling outage. By letter dated February 17, 1984 (Reference 35), Energy Northwest submitted the program plan for the DCRDR. By letter dated November 1, 1985 (Reference 36), Energy Northwest submitted the DCRDR Summary Report. By letter dated July 9, 1990 (Reference 37), the NRC issued a Safety

Evaluation Report documenting the review of the DCRDR Summary Report. By letter dated November 13, 1991 (Reference 37a), the NRC stated that the status of the DCRDR is considered closed. FSAR 7.5.1.22 references the DCRDR analysis which is discussed in FSAR Appendix B Item I.D.1.

- Item 2 identifies 13 human engineering deficiencies which must be corrected and implemented to the NRC's satisfaction prior to exceeding 5% rated power. By letter dated March 19, 1984 (Reference 38), Energy Northwest confirmed that these human engineering deficiencies have been corrected. Item 2 also identifies an additional 7 human engineering deficiencies which must be corrected and implemented to the NRC's satisfaction within 4 months after the issuance of the Operating License. By letter dated April 17, 1984 (Reference 39), Energy Northwest confirmed that these human engineering deficiencies have been corrected. Inspection Report 50-397-84-23 (Reference 40) evaluated Energy Northwest's response to TMI Action 1.D.1 regarding control room design reviews and states that the 20 human engineering deficiencies have been addressed. This item was identified as "Closed".

- Item 3(a) requires implementation of Regulatory Guide (RG) 1.97 Revision 2 requirements (with the exception of the wide range suppression pool level monitoring system) prior to startup following the first refueling outage. By letter dated June 4, 1986 (Reference 41), Energy Northwest confirmed the installation or upgrade of all identified equipment required to meet the recommendations of RG 1.97 Rev. 2, with the exception of the wide range suppression pool level monitoring system. FSAR sections 7.5.1.1 and 7.5.2.1 describe Columbia's compliance with RG 1.97 Rev. 2. Table 7.5-1 lists variables monitored, which have been selected using the methodology established in RG 1.97, NUREG-0737 and the Emergency Procedure Guidelines (EPG).

- Item 3(c) requires implementation of a wide range suppression pool level monitoring system prior to startup following the second refueling outage. By letter dated June 15, 1987 (Reference 42), Energy Northwest confirmed the installation of this equipment. The wide range suppression pool water level instrumentation is described in FSAR section 7.5.1.5.7.

- Item 4 requires submittal of an addendum to the Procedures Generation Package describing the function and task analysis as identified in Supplement 1 to NUREG-0737 within 3 months after issuance of the license. By letter dated February 17, 1984 (Reference 35), Energy Northwest submitted the addendum to the Procedures Generation Package. FSAR 7.5.1.22.1 discusses the interrelationship between the control room instrumentation and the EPG.

- Item 5 requires fully functional emergency response facilities prior to exceeding 5% rated power. By letter dated March 22, 1984 (Reference 43), Energy Northwest notified the NRC that the required emergency response facilities were functional. The emergency response facilities are described in the Emergency Plan.

Proposed Change to Delete License Condition 2.C.(17)

This license condition prohibits operation with partial feedwater heating for the purpose of extending the normal fuel cycle unless justification is provided to and approved by the NRC staff.

Justification for Deletion: By letter dated March 1, 1990 (Reference 44), the NRC issued Amendment 77 approving operation with reduced feedwater heating for the purpose of cycle extension. The issuance of this amendment by the NRC satisfies license condition 2.C.(17). LCS 1.1.6 currently governs operation with feedwater temperature reduction for the purpose of cycle extension.

Proposed Change to Delete License Condition 2.C.(18)

This license condition requires installation of modifications to the automatic depressurization system (ADS) which are acceptable to the NRC and incorporation of the use of the inhibit switch into emergency procedures. This condition was required to be satisfied prior to startup following the first refueling outage.

Justification for Deletion: By letter dated July 26, 1983 (Reference 45), Energy Northwest submitted the proposed modification of the ADS to the NRC. EN committed to modify the ADS logic to bypass the high drywell pressure trip portion of the existing ADS logic and add a manually operated inhibit switch. In Supplement 4 to NUREG-0892 (Reference 4), the NRC noted the acceptability of the proposed modification. By letter dated January 29, 1988 (Reference 46), Energy Northwest stated that the ADS inhibit switches were installed in 1985 and the appropriate emergency procedures were revised. Inspection Report 50-397-88-45 (Reference 47) confirmed that the necessary procedures were revised as required. Thus, this license condition has been satisfied. The ADS logic is described in FSAR section 7.3.1.2.1, Table 7.3-2 and Figure 7.3-5. The ADS inhibit is described in FSAR section 7.3.1.1.1.2.

Proposed Change to Delete License Condition 2.C.(19)

This license condition requires installation of the controls and monitoring instrumentation for the high pressure core spray (HPCS) diesel engine in a freestanding floor mounted panel separate from the engine skid with a location in a vibration-free floor area or qualification of the instrumentation for vibration that will occur during engine operation. This condition was required to be satisfied prior to startup following the first refueling outage.

Justification for Deletion: By letter dated June 3, 1986 (Reference 48), Energy Northwest described the modification that was completed along with the qualification of the controls and instrumentation for vibration levels that occur during engine operation and stated that license condition 2.C.(19) is satisfied. FSAR 8.3.1.1.7.2.10 discusses the qualification of HPCS diesel generator control and monitoring instruments located on the diesel generator skid.

Proposed Change to Delete License Condition 2.C.(20)

This license condition requires installation of air dryers in the diesel engine air starting system. This installation was required to be completed prior to startup following the first refueling outage.

Justification for Deletion: By letter dated June 3, 1986 (Reference 49), Energy Northwest confirmed completion of the installation of the air dryers. Inspection Report 50-397-86-11 (Reference 50) documented the NRC review of the design change package for addition of diesel starting air system air dryers. This license condition has been satisfied. The diesel starting air system air dryers are described in FSAR section 9.5.6.2.

Proposed Change to Delete License Condition 2.C.(21)

This license condition requires redundant, seismic Category I environmentally qualified chillers for control room HVAC be operable. This condition was required to be satisfied prior to May 31, 1984.

Justification for Deletion: By letter dated May 31, 1984 (Reference 51), Energy Northwest confirmed that this license condition has been satisfied. Inspection Report 50-397-90-05 (Reference 52) documented that the chillers had been installed as required. This license condition has been satisfied. The control room chillers are described in FSAR sections 9.4.1.2.1 and 9.4.1.3.1.

Proposed Change to Delete License Condition 2.C.(22)

This license condition requires NRC review and approval of analysis or modifications needed to address the following items related to control system failures: (a) capability to attain a safe shutdown condition following the loss of any Class 1E instrument bus, (b) the impact of control system failures resulting from high energy line breaks (HELB) on the transient and accident analysis, and (c) the impact of control system failures due to the failure of common power sources, sensors, or instrument sensing lines on the transient analysis. This condition was required to be satisfied prior to startup following the first refueling outage.

Justification for Deletion: By letters dated June 24, 1983 (Reference 69) and November 10, 1983 (Reference 70), Energy Northwest submitted the required reports. For item (a) the analysis concluded there were no situations where a single bus power failure would prevent plant personnel from achieving a reactor

cold shutdown condition. For item (b) the analysis concluded that the consequences of the worst case combination of control system failures due to a HELB were a small fraction of 10 CFR 100 guidelines. For item (c) the analysis concluded there were no new transient category events postulated as a result of common sensor failures. By letter dated January 6, 1986 (Reference 53), the NRC documented that the required items have been resolved, the resolution is acceptable and this license condition is satisfied.

Proposed Change to Delete License Condition 2.C.(23)

This license condition requires NRC review and approval of the results of the reconciliation of the hydrodynamic loads for all the safety-related piping, equipment and their supports. This qualification was required to be completed prior to exceeding 5% rated power.

Justification for Deletion: By letters dated March 28, 1983 (Reference 54), June 16, 1983 (Reference 55), and January 24, 1984 (Reference 56), Energy Northwest provided the results of the reconciliation of the hydrodynamic loads for all affected safety-related piping components and equipment and their supports. In Supplement 5 to NUREG-0892 (Reference 19), the NRC stated that based upon the information submitted this license condition is satisfied. FSAR Appendix 3A contains the Plant Design Assessment Report (DAR) which describes the Columbia load definition, load application, load combination, and design margins for hydrodynamic loading conditions. The DAR specifies the Columbia position for each of the pool dynamic loads. The Columbia positions were discussed, reviewed and approved by the NRC.

Proposed Change to Delete License Condition 2.C.(24)

This license condition requires emergency response duty training be provided to the remaining members of the emergency organization staff who were not included in previous training. This training was required to be completed prior to exceeding 5% rated power.

Justification for Deletion: By letter dated March 19, 1984 (Reference 57), Energy Northwest confirmed the completion of the required training. In Supplement 5 to NUREG-0892 (Reference 19), the NRC stated that based upon the information submitted this license condition is satisfied.

Proposed Change to Delete License Condition 2.C.(25)

This license condition requires certification to the NRC that the distribution of tone alert radios and public information brochures has been completed. This distribution was to be completed prior to exceeding 5% rated power.

Justification for Deletion: By letter dated February 3, 1984 (Reference 58), Energy Northwest confirmed the distribution of tone alert radios and brochures was complete. Inspection Report 50-397-84-05 (Reference 59) reviewed the

Benton County distribution records and identifies this item as "Closed". In Supplement 5 to NUREG-0892 (Reference 19), the NRC stated that this license condition is satisfied.

Proposed Change to Delete License Condition 2.C.(26)

This license condition states that in the event that the NRC finds that the lack of progress in completion of the procedures in the Federal Emergency Management Agency's (FEMA) final rule, 44 CFR Part 350, is an indication that a major substantive problem exists in achieving or maintaining an adequate state of preparedness, the provisions of 10 CFR 50.54(s)(2) will apply.

Justification for Deletion: This license condition is historical. In Supplement 4 to NUREG-0892 (Reference 4), the NRC concluded that the state of onsite and offsite emergency preparedness provides reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency. The provisions of 10 CFR 50.54(s)(2) continue to remain applicable in the event that the NRC finds that the state of emergency preparedness does not provide reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency. The requirements in 10 CFR 50.54 are conditions applicable to every nuclear power reactor operating license issued under 10 CFR Part 50. Therefore, this license condition can be deleted.

Proposed Change to Delete License Condition 2.C.(27)

This license condition requires NRC review and approval of information related to the effluent radiation monitors. This condition was required to be satisfied prior to exceeding 5% rated power.

Justification for Deletion: By letter dated June 29, 1984 (Reference 60), Energy Northwest submitted the required information. Inspection Report 50-397-84-20 (Reference 61) discussed the NRC review of the information and confirmed that there were no items of noncompliance.

Proposed Change to Delete License Condition 2.C.(28)

This license condition requires the environmental qualification of all electrical equipment in accordance with 10 CFR 50.49. This qualification was required to be completed prior to November 30, 1985.

Justification for Deletion: By letter dated December 30, 1985 (Reference 62), Energy Northwest confirmed the environmental qualification of required equipment was completed by November 30, 1985. In Supplement 5 to NUREG-0892 (Reference 19), the NRC stated that license condition 2.C.(28) is satisfied. FSAR 3.11 documents the Columbia environmental qualification program.

Proposed Change to Delete License Condition 2.C.(30) and Appendix C

This license condition references the Additional Concerns contained in Appendix C and requires operation of the facility in accordance with these Additional Concerns. All items listed in Appendix C have been completed

Justification for Deletion:

- The first Additional Condition, which is associated Amendment 149, requires the relocation of certain TS requirements to licensee controlled documents (e.g., FSAR) as a result of Columbia's conversion to the Improved Technical Specifications (ITS). This action was required to be completed by June 30, 1997. Licensing documents, programs and procedures were revised as required to implement the ITS and meet this license condition. Inspection Report 50-397-97-05 (Reference 63) documented that the ITS has been implemented. This condition has been satisfied.

- The second Additional Condition, which is also associated with Amendment 149, requires implementation of Regulatory Guide 1.160 commitments. This action was required to be completed 90 days from issuance of Amendment 149, which was issued on March 4, 1997. Specifically, as part of the change to remove the provisions for accelerated testing of diesel generators from the TS, Energy Northwest committed to implement a maintenance program for monitoring and maintaining diesel generator performance in accordance with the provisions of the maintenance rule and consistent with the guidance of RG 1.160. Inspection Report 50-397-96-18 (Reference 64) evaluated Columbia's implementation of the maintenance rule. This condition has been satisfied.

- The third Additional Condition, which is associated with Amendment 151, requires that the calculation of delta-CPR include the application of a conservative adder. This action was required to be completed prior to exceeding 25% rated power for Cycle 13. This action has been completed as required and is no longer applicable since Columbia is currently operating in Cycle 20. Inspection Report 50-397-98-01 (Reference 65) addresses the required conservative adder applied for Cycle 13. This condition has been satisfied.

- The fourth Additional Condition, which is associated with Amendment 153, requires the incorporation of information into the FSAR resulting from the issuance of Amendment 153 regarding suppression pool strainer screen material. This action was required to be completed 90 days from issuance of Amendment 153, which was issued on May 21, 1998. This action has been completed and the license condition has been satisfied. The relevant discussion is contained in FSAR section 6.1.1.1.3(c).

- The final Additional Condition, which is also associated with Amendment 153, requires inspection of the suppression pool screen material coupons. This action was required to be completed during refueling outage 14. This action was completed in R14, and the license condition has been satisfied.

Proposed Change to Appendix B

The Environmental Protection Plan for Columbia contains a reference to 10 CFR 51.5(b)(2) that is outdated. This reference is proposed for deletion from Appendix B.

Justification for Change: 10 CFR Part 51 was revised effective June 7, 1984, to implement section 102(2) of the National Environmental Policy Act of 1969 as amended, and section 51.5(b)(2) was deleted as part of the revision.

4.0 REGULATORY EVALUATION

4.1 Applicable Regulatory Requirements/Criteria

10 CFR 50.90

In accordance with 10 CFR 50.90, "Application for amendment of license, construction permit, or early site permit," Energy Northwest is requesting an amendment to Operating License NPF-21 for Columbia. The proposed amendment provides for the administrative removal of time, cycle or modification-related items from the Operating License.

4.2 Precedents

The NRC has approved similar license amendment requests related to the deletion of historical license conditions that have been met. Specifically, the NRC issued Amendments 194 and 181 for LaSalle County Station, Units 1 and 2, respectively (ML092450404), Amendment 155 for the Fermi 2 facility (ML030170371), Amendment 211 for the North Anna Power Station, Unit No. 2 (ML020800601), Amendments 227 and 227 for the Surry Power Station, Unit Nos. 1 and 2, respectively (ML012470337), and Amendments 152 and 144 for the Joseph M. Farley Nuclear Plant, Units 1 and 2, respectively (ML013410430). The above amendments approved changes to the respective facilities' Operating Licenses to remove license conditions that were completed or otherwise no longer in effect. Similarly, Energy Northwest is submitting this license amendment request to remove license conditions that no longer apply.

4.3 Significant Hazards Consideration

The proposed amendment provides for the administrative removal of time, cycle or modification-related items from the Operating License. These items have been implemented or superseded, are no longer applicable, and therefore, no longer need to be maintained in the Operating License.

Columbia has evaluated whether or not a significant hazards consideration is involved with the proposed amendment by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of Amendment" as discussed below.

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

   Response: No.

   The proposed amendment deletes license conditions which are completed or are otherwise obsolete. As such, the changes are strictly administrative in nature. The changes do not affect the manner by which the facility is operated and do not change any facility design feature, structure, system, or component. The proposed changes do not alter the design assumptions for the systems or components used to mitigate the consequences of an accident. Therefore, this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

   Response: No.

   The proposed amendment deletes license conditions which are completed or are otherwise obsolete. As such, the changes are strictly administrative in nature. The changes do not affect the manner by which the facility is operated and do not change any facility design feature, structure, system, or component. No new or different type of equipment will be installed. Therefore, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

   Response: No.

   The proposed amendment to the Operating License is administrative in nature and has no impact on the margin of safety. The changes do not affect any plant safety parameters or setpoints. The license conditions have been satisfied as required. Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, Energy Northwest concludes that the proposed changes do not involve a significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

4.4 Conclusions

Based on the considerations discussed above (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation with the proposed changes to the Operating License and (2) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

5.0 ENVIRONMENTAL CONSIDERATION

The proposed amendment is confined to (i) changes to surety, insurance, and/or indemnity requirements, or (ii) changes to recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(10). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

6.0 REFERENCES

1. Inspection Report 50-397-84-07, dated April 18, 1984
2. Letter from J. D. Martin (Licensee) to J. B. Martin (NRC), "Nuclear Plant No. 2 Operating License NPF-21 Attachment 1 Status," dated April 12, 1984
3. Letter from G. C. Sorensen (Licensee) to A. Schwencer (NRC), "Nuclear Project No. 2 Chemical Waste Processing Preoperational Test," dated January 17, 1984
4. SSER #4 (NUREG-0892), "Safety Evaluation Report Related to the Operation of WPPSS Nuclear Project No. 2, Supplement 4," dated December 1983
5. Letter from A. Schwencer (NRC) to G. C. Sorensen (Licensee), "Chemical Waste Processing Preoperational Test," dated April 13, 1984
6. Letter G. C. Sorensen (Licensee) to A. Schwencer (NRC), "Nuclear Plant No. 2 Operating License NPF-21, Amendment No. 1, Licensing Condition 2.C.(1), Attachment 1, Paragraph 1.c, Preoperational/Acceptance Tests," dated July 18, 1984
7. Letter G. C. Sorensen (Licensee) to A. Schwencer (NRC), "Nuclear Project No. 2 Completion of Construction Modifications Piping/Pipe Supports," dated March 16, 1984
8. Inspection Report 50-397-84-04, dated March 21, 1984
9. Inspection Report 50-397-83-60, dated February 22, 1984
10. Inspection Report 50-397-84-18, dated August 7, 1984
11. Inspection Report 50-397-86-18, dated June 20, 1986
12. Letter from C. M. Powers (Licensee) to J. B. Martin (NRC), "Washington Nuclear Plant – Unit 2 Final Startup Report," dated April 17, 1985

13. Inspection Report 50-397-84-38, dated February 1, 1985
14. Inspection Report 50-397-85-27, dated August 9, 1985
15. Letter G. C. Sorensen (Licensee) to E. G. Adensam (NRC), "Nuclear Plant No. 2 Operating License NPF-21, License Condition 2.C.(4), Seismic Equipment Qualification," dated June 3, 1986
16. Letter G. C. Sorensen (Licensee) to A. Schwencer (NRC), "Nuclear Project No. 2 Environmental Qualification Report for Safety-Related Equipment, September 1983," dated September 16, 1983
17. Letter G. C. Sorensen (Licensee) to A. Schwencer (NRC), "Nuclear Project No. 2 Environmental Qualification Assurance," dated January 18, 1984
18. Letter G. C. Sorensen (Licensee) to A. Schwencer (NRC), "Nuclear Project No. 2 Qualification of Pipeline Mounted Equipment," dated January 23, 1984
19. SSER #5 (NUREG-0892), "Safety Evaluation Report Related to the Operation of WPPSS Nuclear Project No. 2, Supplement 5," dated April 1984
20. Letter from G. C. Sorensen (Licensee) to W. R. Butler (NRC), "Nuclear Plant No. 2 Operating License NPF-21, License Condition 2.C.(6), Ultimate Heat Sink," dated September 27, 1985
21. Letter E. G. Adensam (NRC) to G. C. Sorensen (Licensee), "License Condition 2.C.(6) Ultimate Heat Sink," dated December 11, 1985
22. Letter G. C. Sorensen (Licensee) to E. G. Adensam (NRC), "Nuclear Plant No. 2 Operating License NPF-21, License Condition (7) Turbine Missiles," dated November 20, 1986
23. Letter E. G. Adensam (NRC) to G. C. Sorensen (Licensee), "WNP-2: License Condition on Turbine Missiles," dated March 27, 1987
24. Letter G. C. Sorensen (Licensee) to E. G. Adensam (NRC), "Nuclear Plant No. 2 Operating License NPF-21, Satisfaction of License Condition 2.C.(8)," dated February 4, 1986
25. Letter from G. C. Sorensen (Licensee) to E. G. Adensam (NRC), "Nuclear Plant No. 2 Operating License NPF-21, Satisfaction of License Condition 2.C.(8), Supplemental Information," dated May 9, 1986
26. Letter E. G. Adensam (NRC) to G. C. Sorensen (Licensee), "WNP-2 License Condition 2.C.(8) – High Burnup Fission Gas Release," dated May 23, 1986
27. Letter G. C. Sorensen (Licensee) to A. Schwencer (NRC), "Nuclear Plant No. 2 Reactor Vessel Water Level Instrumentation, License Condition (9) and Response to Generic Letter 84-23," dated November 27, 1984
28. Letter G. C. Sorensen (Licensee) to E. G. Adensam (NRC), "Nuclear Plant No. 2 Operating License NPF-21, License Condition 2.C.(10)," dated January 27, 1986
29. Letter E. G. Adensam (NRC) to G. C. Sorensen (Licensee), "WNP-2 Operating License NPF-21 License Condition 2.C.(10)," dated March 21, 1986

30. Letter G. C. Sorensen (Licensee) to E. G. Adensam (NRC), "Nuclear Plant No. 2 Operating License NPF-21, License Condition 2.C.(12), Alternate Remote Shutdown System," dated June 2, 1986

31. Letter G. C. Sorensen (Licensee) to E. G. Adensam (NRC), "Nuclear Plant No. 2 Operating License NPF-21, Alternate Remote Shutdown System," dated August 6, 1986

32. Inspection Report 50-397-86-18, dated June 20, 1986

33. Letter G. C. Sorensen (Licensee) to A. Schwencer (NRC), "Nuclear Plant No. 2 Safety Evaluation Report, NUREG-0892, Closure of License Condition 10, BWR Startup or Operating Experience," dated November 11, 1983

34. Letter G. C. Sorensen (Licensee) to A. Schwencer (NRC), "Nuclear Plant No. 2 Termination of Need for Shift Advisor," dated October 16, 1984

35. Letter G. C. Sorensen (Licensee) to A. Schwencer (NRC), "Nuclear Plant No. 2 Detailed Control Room Design Review Program Plan and Addendum to the Procedures Generation Package," dated February 17, 1984

36. Letter G. C. Sorensen (Licensee) to W. R. Butler (NRC), "Nuclear Plant No. 2 Submittal of Detailed Control Room Design Review (DCRDR) Summary Report," dated November 1, 1985

37. Letter R. B. Samworth (NRC) to G. C. Sorensen (Licensee), "Detailed Control Room Design Review," dated July 9, 1990

37a. Letter P. L. Eng (NRC) to G. C. Sorensen (Licensee), "Status of TMI Item I.D.1.2, 'Detailed Control Room Design Review' (DCRDR) at Washington Public Power Supply System Nuclear Project No. 2 (WNP-2)," dated November 13, 1991

38. Letter G. C. Sorensen (Licensee) to A. Schwencer (NRC), "Nuclear Plant No. 2 Licensing Condition (16)," dated March 19, 1984

39. Letter G. C. Sorensen (Licensee) to A. Schwencer (NRC), "Nuclear Project No. 2 Operating License NPF-21, Licensing Condition (16)," dated April 17, 1984

40. Inspection Report 50-397-84-23, dated September 18, 1984

41. Letter G. C. Sorensen (Licensee) to E. G. Adensam (NRC), "Nuclear Plant No. 2 Operating License NPF-21, Satisfaction of License Condition 2.C.(16), Attachment 2, Item 3(a)," dated June 4, 1986

42. Letter G. C. Sorensen (Licensee) to Document Control Desk (NRC), "Nuclear Plant No. 2 Operating License NPF-21 Satisfaction of License Condition 2.C.(16), Attachment 2, Item 3(C), Wide Range Suppression Pool Level Monitoring System," dated June 15, 1987

43. Letter G. C. Sorensen (Licensee) to A. Schwencer (NRC), "Nuclear Plant No. 2 Facility Operating License NPF-21, Licensing Condition (16), Emergency Response Capability," dated March 22, 1984

44. Letter R. B. Samworth (NRC) to G. C. Sorensen (Licensee), "Issuance of Amendment No. 77 to Facility Operating License No. NPF-21 – WPPSS Nuclear Project No. 2," dated March 1, 1990

45. Letter G. C. Sorensen (Licensee) to A. Schwencer (NRC), "Nuclear Project No. 2 Safety Evaluation Report – NUREG-0892, Outstanding Issue 1.7(9), Modifications to ADS System Logic," dated July 26, 1983

46. Letter J. D. Arbuckle (Licensee) to Document Control Desk (NRC), "Nuclear Plant No. 2 License No. NPF-21 NRC Inspection Report 87-19," dated January 29, 1988

47. Inspection Report 50-397-88-45, dated February 14, 1989

48. Letter G. C. Sorensen (Licensee) to E. G. Adensam (NRC), "Nuclear Plant No. 2 Operating License 2.C.(19), Relocation of Engine-Mounted Controls," dated June 3, 1986

49. Letter G. C. Sorensen (Licensee) to E. G. Adensam (NRC), "Nuclear Plant No. 2 Operating License NPF-21, Satisfaction of License Condition 2.C.(20)," dated June 3, 1986

50. Inspection Report 50-397-86-11, dated August 5, 1986

51. Letter G. C. Sorensen (Licensee) to A. Schwencer (NRC), "Nuclear Plant No. 2 Operating License NPF-21, Licensing Condition 2.C.(21), Control Room Chillers," dated May 31, 1984

52. Inspection Report 50-397-90-05, dated August 9, 1990

53. E. G. Adensam (NRC) to G. C. Sorensen (Licensee), "License Condition 2.C.(22) Control System Failures," dated January 6, 1986

54. Letter G. D. Bouchey (Licensee) to A. Schwencer (NRC), "Nuclear Project No. 2 Hydrodynamic Loads Outside Containment," dated March 28, 1983

55. Letter G. D. Bouchey (Licensee) to A. Schwencer (NRC), "Nuclear Project No. 2 Hydrodynamic Loads Outside Containment," dated June 16, 1983

56. Letter G. C. Sorensen (Licensee) to A. Schwencer (NRC), "Nuclear Plant No. 2 Design Assessment for Hydrodynamic Loads," dated January 24, 1984

57. Letter G. C. Sorensen (Licensee) to A. Schwencer (NRC), "Nuclear Plant No. 2 Status of Emergency Preparedness License Requirements for Operation in Excess of Five Percent," dated March 19, 1984

58. Letter G. C. Sorensen (Licensee) to A. Schwencer (NRC), "Nuclear Plant No. 2 Status of Emergency Preparedness License Requirements for Operation in Excess of Five Percent," dated February 3, 1984

59. Inspection Report 50-397-84-05, dated March 16, 1984

60. Letter G. C. Sorensen (Licensee) to A. Schwencer (NRC), "Nuclear Plant No. 2 Operating License NPF-21, Licensing Condition 2.C.(27), Effluent Radiation Monitors," dated June 29, 1984

61. Inspection Report 50-397-84-20, dated August 24, 1984

62. Letter G. C. Sorensen (Licensee) to E. G. Adensam (NRC), "Nuclear Plant No. 2 Equipment Qualification," dated December 30, 1985
63. Inspection Report 50-397-97-05, dated May 6, 1997
64. Inspection Report 50-397-96-18, dated January 29, 1997
65. Inspection Report 50-397-98-01, dated May 8, 1998
66. NUREG-0892, "Safety Evaluation Report Related to the Operation of WPPSS Nuclear Project No. 2, dated March 1982
67. Letter G. C. Sorensen (Licensee) to A. Schwencer (NRC), "Nuclear Plant No. 2 Operating License NPF-21; Request for Amendment to Licensing Condition 2.C(11), Shield Wall Deferral," dated August 15, 1984
68. Letter A. Schwencer (NRC) to G. C. Sorensen (Licensee), "Issuance of Amendment No. 7 to Facility Operating License NPF-21, WPPSS Nuclear Project No. 2," date December 10, 1984
69. Letter G. D. Bouchey (Licensee) to A. Schwencer (NRC), "Nuclear Project No. 2 Control System Failures Questions, WNP-2 SER #3, Outstanding Issue #13, Final Submittal," dated June 24, 1983
70. Letter G. C. Sorensen (Licensee) to A. Schwencer (NRC), "Nuclear Project No. 2 Supply System Response to FSAR Questions 031.143 – 031.159," dated November 10, 1983

(3) Pursuant to the Act and 10 CFR Parts 30, 40 and 70, to receive, possess, and use at any time any byproduct, source and special nuclear material as sealed neutron sources for reactor startup, sealed sources for reactor instrumentation and radiation monitoring equipment calibration, and as fission detectors in amounts as required;

(4) Pursuant to the Act and 10 CFR Parts 30, 40 and 70, to receive, possess, and use in amounts as required any byproduct, source of special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus or components; and

(5) Pursuant to the Act and 10 CFR Parts 30, 40 and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility.

(6) Pursuant to the Act and 10 CFR Parts 30, 40 and 70, to store byproduct, source and special nuclear materials not intended for use at Columbia Generating Station. The materials shall be no more than 9 sealed neutron radiation sources designed for insertion into pressurized water reactors and no more than 40 sealed beta radiation sources designed for use in area radiation monitors. The total inventory shall not exceed 24 microcuries of strontium-90, 20 microcuries of uranium-235, 30 curies of plutonium-238, and 3 curies of americium-241.

C. This license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations set forth in 10 CFR Chapter I and is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

(1) Maximum Power Level

The licensee is authorized to operate the facility at reactor core power levels not in excess of full power (3486 megawatts thermal). ~~Items in Attachment 1 shall be completed as specified. Attachment 1 is hereby incorporated into this license.~~

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment ~~218~~ 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.

a. For Surveillance Requirements (SRs) not previously performed by existing SRs or other plant tests, the requirement will be considered met on the implementation date and the next required test will be at the interval specified in the Technical Specifications as revised in Amendment No. 149.

(3) ~~Initial Test Program (Section 14, SER)*~~ Deleted.

~~The licensee shall conduct the initial test program (set forth in Section 14 of the licensee's Final Safety Analysis Report, as amended) without making any modifications of this program unless such modifications are in accordance with the provisions of 10 CFR Section 50.59. In addition, the licensee shall not make any major modifications to this program unless modifications have been identified and have received prior NRC approval. Major modifications are defined as:~~

~~(a) Elimination of any test identified in Section 14 of the licensee's Final Safety Analysis Report, as amended, as being essential;~~

~~(b) Modification of test objectives, methods or acceptance criteria for any test identified in Section 14 of the licensee's Final Safety Analysis Report, as amended, as being essential;~~

~~(c) Performance of any test at a power level different from that described in the program; and~~

~~(d) Failure to complete any tests included in the described program (planned or scheduled) for power levels up to the authorized power level.~~

(4) ~~Seismic Equipment Qualification (Section 3.10, SSER #4)~~ Deleted.

~~Prior to startup following the first refueling outage, the licensee shall complete seismic qualifications for all equipment approved by the NRC staff for interim operation.~~

(5) ~~Equipment Qualification (Sections 3.10.1, 3.11.3, SSER #4)~~ Deleted.

~~Prior to exceeding five (5) percent of rated power, the licensee shall provide the staff for their review and approval:~~

~~(a) assurance that all equipment listed in Appendix 3B is either environmentally qualified or provide justification for interim operation.~~

*The parenthetical notation following the title of many license conditions denotes the section of the Safety Evaluation Report and/or its supplements wherein the license condition is discussed.

~~(b) for all pipe-mounted safety-related equipment, provide assurance that the "g" values for the as-installed configuration do not exceed the "g" values established in the equipment qualification information documentation (QID) files or provide justification for interim operation.~~

(6) ~~Ultimate Heat Sink (Section 2.4.5, SER)~~ Deleted.

~~Prior to startup following the first refueling outage, the licensee shall perform operational testing of the ultimate heat sink spray ponds to verify analyzed parameters of drift loss, seepage and operational capacity. The licensee shall inform the NRC staff of scheduled testing at least 30 days in advance of such testing and shall provide the test results and conclusions for NRC review and approval.~~

(7) ~~Turbine Missiles (Section 3.5.1.3, SSER #4)~~ Deleted.

~~The licensee shall submit for NRC staff approval, within three years of date of issuance of this license, a turbine system maintenance program based on the manufacturer's calculations of missile generation probabilities acceptable to the NRC staff or volumetrically inspect all low pressure turbine rotors at the second refueling outage, and at every other refueling outage thereafter until a maintenance program is approved by the NRC staff.~~

(8) ~~Fuel Coolability (Section 4.2.3.3(1), SER)~~ Deleted.

~~Prior to startup following the first refueling outage, the licensee shall provide for NRC staff review and approval revised analyses showing the effects of high-burnup fission gas release on loss-of-coolant accident.~~

(9) ~~Inadequate Core Cooling (ICC) Instrumentation Analysis (Section 4.4.7, SER)~~ Deleted.

~~The licensee shall implement staff's requirements regarding additional instrumentation for detection of inadequate core cooling which may result from the staff's review of the BWR Owner's Group Reports (SLI-8211 and SLI-8218) and the licensee's plant specific evaluation report addressing the subjects. Any required modifications shall be completed on a schedule acceptable to the NRC staff.~~

(10) ~~Thermal-Hydraulic Stability (Section 4.4.4, SER)~~ **Deleted.**

~~Prior to startup following the first refueling outage, the licensee shall provide for NRC staff review and approval a revised stability analysis.~~

(11) Shield Wall Deferral (Section 12.3.2, SSER #4, Licensee Amendment #7)

The licensee shall complete construction of the deferred shield walls and window as identified in Attachment 3, as amended by this license amendment.

(12) ~~Alternate Remote Shutdown System (Section 7.4.2.3, SSER #1)~~ **Deleted.**

~~Prior to startup following the first refueling outage, the licensee shall install, test, and have operable the alternate remote shutdown system.~~

(13) Deleted.

(14) Fire Protection Program (Generic Letter 86-10)

The licensee shall implement and maintain in effect all provisions of the approved fire protection program as described in Section 9.5.1 and Appendix F of the Final Safety Analysis Report (FSAR) for the facility thru Amendment #39 and as described in subsequent letters to the staff through November 30, 1988, referenced in the May 22, 1989 safety evaluation and in other pertinent sections of the FSAR referenced in either Section 9.5.1 or Appendix F and as approved in the Safety Evaluation Report issued in March 1982 (NUREG 0892) and in Supplements 3, issued in May 1983, and 4, issued in December 1983, and in safety evaluations issued with letters dated November 11, 1987 and May 22, 1989 subject to the following provision:

The license may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

- 6a -

(15) ~~BWR Startup or Operating Experience (Section 13.1.2.1(1), SER)~~ Deleted.

~~During the startup test program, the licensee shall have on each shift a licensed individual with previous startup or operating experience on a comparable BWR, or an advisor who meets these experience requirements.~~

(16) ~~Emergency Response Capability (Section 18.0, SER, SSER#4, TMI Item I.D.1 and Section 13.5.2, SER, SSER #4)~~ Deleted.

~~The licensee shall correct the design deficiencies for the control room and complete the other related emergency response capabilities as required by Attachment 2 to this license.~~

Amendment No. xxx

(17) ~~Operation with Partial Feedwater Heating (Section 15.1, SER)~~ Deleted.

~~The licensee shall not operate with partial feedwater heating for the purpose of extending the normal fuel cycle unless acceptable justification is provided to and approved by NRC staff.~~

(18) ~~Modification of Automatic Depressurization System Logic - Feasibility for Increased Diversity for Some Event Sequences (II.K.3.18, Section 6.3.5, SER, SSER #4)~~ Deleted.

~~Prior to startup following the first refueling outage, the licensee shall:~~

~~(a) Install modifications to the Automatic Depressurization System acceptable to the NRC;~~

~~(b) Incorporate into the Plant Emergency Procedures the usage of the inhibit switch.~~

(19) ~~Relocation of Engine-Mounted Controls (Section 9.5.4.1, SER, SSER #4)~~ Deleted.

~~Prior to startup following the first refueling outage, the controls and monitoring instrumentation on the HPCS diesel engine skid shall be installed in a freestanding floor mounted panel separate from the engine skid. The controls and monitoring instrumentation shall be located in a vibration free floor area or shall be qualified for the vibrations that will occur during engine operation.~~

(20) ~~Emergency Diesel Engine Starting System (Section 9.5.6, SER, SSER #4)~~ Deleted.

~~Prior to startup following the first refueling outage, air dryers shall be installed in the diesel engine air starting system.~~

(21) ~~Control Room Chillers Installation (Section 9.4.1, SER, SSER #4)~~
Deleted.
~~The licensee shall have operable before May 31, 1984, redundant, seismic Category I environmentally qualified water chillers for control room HVAC.~~

- 8 -

(22) ~~Control Systems Failures (Sections 7.7.2.1, 7.7.2.2, 7.5.2.3, SER, SSER #4)~~ Deleted.

~~Prior to startup following the first refueling outage, the licensee shall provide to NRC staff for review and approval any analysis or modifications needed to resolve the following items.~~

~~(a) capability to attain a safe shutdown condition following the loss of any Class 1E instrument bus~~

~~(b) the impact of control systems failures resulting from high energy line breaks on the transient and accident analyses~~

~~(c) the impact of control systems failures due to the failure of common power sources, sensors, or instrument sensing lines on the transient analyses.~~

(23) ~~Hydrodynamic Loads (Section 3.9.3.1 SER, SSER #4)~~ Deleted.

~~Prior to exceeding five (5) percent of rated thermal power, the licensee shall provide for NRC staff review and approval the results of the reconciliation of the hydrodynamic loads for all the safety-related piping, equipment and their supports.~~

(24) ~~Emergency Planning Program (Section 13.3, SER, SSER #4)~~ Deleted.

~~Prior to exceeding five (5) percent of rated thermal power, functionally specific training in emergency response duties must be provided to the remaining members of the emergency organization staff who were not included in previous emergency preparedness training specified in the minimum staffing requirements of Table B-1 of NUREG-0654 (including on-shift and 30 and 60 minute augmentation capability).~~

(25) ~~Offsite Emergency Preparedness (Section 13.3, SSER #4)~~ Deleted.

~~Prior to exceeding five (5) percent of rated thermal power, the licensee shall certify to the NRC that:~~

~~(1) The distribution of tone alert radios, which are part of the alert and notification system, has been completed to residents within the plume exposure pathway Emergency Planning Zone (EPZ).~~

~~(2) The distribution of public information brochures has been completed to the population within the plume exposure pathway EPZ.~~

(26) ~~Progress of Offsite Emergency Preparedness (Appendix D, SER)~~
Deleted.
~~In the event that the NRC finds that the lack of progress in completion of the procedures in the Federal Emergency Management Agency's final rule, 44 C.F.R. Part 350, is an indication that a major substantive problem exists in achieving or maintaining an adequate state of preparedness, the provisions of 10 C.F.R. Section 50.54(s)(2) will apply.~~

(27) ~~Effluent Radiation Monitors (Section 11.5, SSER #4)~~ Deleted.

~~Prior to July 1, 1984, the licensee shall provide the following information to the NRC staff for their review and approval:~~

~~1. Sensitivity of the effluent monitors.~~

~~2. Evaluation of response times of these instruments.~~

~~3. Evaluation of the instruments per criteria set forth in Section 5.4.7 of ANSI 13.10.~~

~~4. Compliance with Section 5.4.9 of ANSI 13.10.~~

~~5. Evaluation of capability to provide a calibrated electrical signal to verify circuit alignment and, if used, a commitment, that they be qualified.~~

(28) ~~Environmental Qualifications (Section 3.11, SER, SSER #3, SSER #4)~~
Deleted.
~~Prior to November 30, 1985, the licensee shall environmentally qualify all electrical equipment according to the provisions of 10 CFR 50.49.~~

(29) Protection of the Environment (FES)

Before engaging in additional construction or operational activities which may result in a significant adverse environmental impact that was not evaluated or that is significantly greater than the evaluation in the Final Environmental Statement the licensee shall provide a written notification to the Director of the Office of Nuclear Reactor Regulation and receive written approval from that office before proceeding with such activities.

(30) ~~Additional Concerns~~ Deleted.

~~The Additional Concerns contained in Appendix C, as revised through Amendment No. 153, are hereby incorporated into this license. Energy Northwest shall operate the facility in accordance with the Additional Concerns.~~

ATTACHMENT 1 TO OPERATING LICENSE NPF-21

~~The licensee shall complete the following requirements within the schedule noted below:~~ Deleted.

~~1. Preoperational/Acceptance Tests~~

~~a. The licensee shall, prior to loading of fuel in the core, complete the System 36 preoperational testing to assure that those monitors required for fuel load fully meet the Technical Specification requirements without reliance on action statements.~~

~~b. The licensee shall successfully complete the following preoperational/acceptance tests before exceeding 5% power:~~

~~PT-33.0-B~~	~~Chemical Waste Processing~~
~~PT-37.0-D~~	~~Miscellaneous Radiation Monitoring Equipment~~
~~PT-40.0-A~~	~~Off-Gas System~~
~~AT-65.0-A~~	~~Sealing Steam System~~
~~AT-66.0-A~~	~~Condenser Air Removal~~
~~PT-69.0-A~~	~~Condensate System~~
~~PT-70.0-A~~	~~Condensate Storage Transfer~~
~~PT-71.0-A~~	~~Condensate Filter Demineralizer System~~
~~PT-72.0-A~~	~~Reactor Feedwater Turbine and Pumps~~
~~PT-72.0-B~~	~~Reactor Feedwater Controls~~
~~AT-74.0-A~~	~~Heater Vents and Drains~~
~~AT-82.0-A~~	~~Turbine Building Heating and Ventilating~~
~~PT-92.0-A~~	~~Off Gas Vault HVAC~~
~~AT-110.0-A~~	~~Loose Parts Detection~~
~~PT-201.0-A~~	~~Primary Containment Integrated Leakage Rate Test~~
~~AT-302.0-A~~	~~Integrated Condenser In-Leakage Test~~

~~c. The licensee shall complete PT-22.0-B, Nitrogen Inerting System prior to six months after initial criticality.~~

~~2. Hangers Supports, and Restraints~~

~~All QI-SI and QII-SI hangers, supports, and restraints needing installation and/or modification will be completed prior to exceeding 5% power.~~

~~3. Construction Completion (Master Completion List Schedule)~~

~~The licensee shall restrain fuel loading, primary system steam pressurization, exceeding 5% power, and commercial operation* by prerequisite completion of the associated categories of items in accordance with the schedule shown on the Project Master Completion List dated December 19, 1983. The licensee shall not extend the completion categories for individual items on the list without prior notification and individual concurrence by a representative of the NRC Regional Office.~~

~~*Commercial operation is defined as the 100% power warranty run or July 1, 1984, whichever occurs first.~~

ATTACHMENT 2

~~The licensee shall complete the following requirements on the schedule noted below:~~ Deleted.

~~1. Detailed Control Room Design Review (DCRDR)~~

~~The licensee shall submit a program plan for DCRDR for NRC staff review within two (2) months after the issuance of this operating license and a summary report not later than six (6) months prior to the first refueling outage.~~

~~2. Control Room Design Improvements~~

~~The licensee shall correct and implement to the NRC staff's satisfaction, the following human engineering deficiencies prior to exceeding five (5) percent of rated thermal power:~~

~~A 5.17* Inoperative System Status Panels~~
~~A 7.15 Inoperative TDAS and GOS computer systems~~
~~D 3.59 Multiple-meaning abbreviations, lack of abbreviation control~~
~~D 4.23 Hard-to-operate pushbuttons on controllers~~
~~D 5.40 Non-standard fuel zone monitor meter scale, P-601~~
~~D 5.44 Identical push button/nonpush button status lights, P-820~~
~~D 5.46 Identical push button/push button indicator lights, Rod Worth Minimizer, Rod Monitor control subpanels, P-603~~
~~D 6.101 Inadequate labeling, Isolation Control, P-601~~
~~D 8.38 Non-identical RFW meter groupings for Systems A & B, P-840~~
~~D 9.5 Inconsistent scales, CW Inlet Plenum Lever Indicator and Controller, P-840~~
~~E 5.61 Recorder pointers obscure scale numerals/graduation marks~~
~~E 5.69 RPV depressurization procedures call for greater reading accuracy than is provided by pressure indicators~~
~~F 4.37 Switch handles obscure pointers/labels, P-800~~

~~The licensee shall correct and implement to the NRC staff's satisfaction, the following human engineering deficiencies within four (4) months after the issuance of this operating license:~~

~~A 3.4 Audio alarm signal detection and intensity levels~~
~~D 4.22 Extension handles for throttlable valve controls, P-820~~
~~D 5.49 Proper chart paper for Generator Monitor Temperature Recorder, P-820~~
~~E 3.71 Inconsistent pushbutton color coding~~
~~E 4.27 Extension handle for RPS reset switch, P-603~~
~~F 6.115 Inconsistent fonts, switch escutcheon legends~~
~~F 6.116 Inconsistent pushbutton color coding~~

~~*HED finding identification as given in NRC letter to D. W. Mazur dated 9/20/83.~~

~~Attachment 2~~

~~-2-~~

~~3. Regulatory Guide 1.97, Revision 2 Compliance~~

~~(a) The licensee shall implement (installation or upgrade) requirements of Regulatory Guide 1.97, Revision 2 with the exception of items (b) and (c) below prior to startup following the first refueling outage.~~

~~(b) Deleted.~~

~~(c) The licensee shall implement (install and have operational) a wide range suppression pool level monitoring system which satisfies the Category 1 equipment specifications in accordance with Regulatory Guide 1.97, Revision 2, prior to startup following the second refueling outage.~~

~~4. Upgrade Emergency Operating Procedures (EOPs)~~

~~The licensee shall provide within two(2) months after the issuance of this operating license, an addendum to the Procedures Generation Package describing the function and task analysis as identified in Supplement 1 to NUREG-0737.~~

~~5. Emergency Response Facilities~~

~~The licensee shall have fully functional emergency response facilities (Technical Support Center, Operational Support Center, and Emergency Operations Facility) prior to exceeding five (5) percent of rated power.~~

ATTACHMENT 3

LIST OF SHIELD WALLS

*1. ~~FSAR Figure 12.3-32, Zone H-9 - The partial height wall outside the spent resin tank room.~~ Deleted.

*2. ~~FSAR Figure 12.3-26, Zone G-12 - The tube access wall to the main condenser.~~ Deleted.

**3. ~~FSAR Figure 12.3-27, Zone D-11 - Same as above, only other end of condenser.~~ Deleted.

*4. ~~FSAR Figure 12.3-34, Zone H-8 - The access blockout to the spare demineralizer cubicle.~~ Deleted.

**5. FSAR Figure ~~12.3-33~~ 12.3-12, Zone G-9 - ~~Same as above for the~~ The access blockout to duplicate centrifuge room.

**6. FSAR Figure ~~12.3-33~~ 12.3-12, Zone F-9 - Same as above for the duplicate centrifuge.

**7. FSAR Figure ~~12.3-34~~ 12.3-13, Zone J-5 - The blockout for one of the two decon concentrators.

**8. FSAR Figure ~~12.3-32~~ 12.3-11, Zone D-8 - The two block walls at the north end of the truck loading bay.

**9. FSAR Figure ~~12.3-32~~ 12.3-11, Zone E-8 - The leaded glass viewing window in the radwaste area.

~~* Items 1, 2, and 4 will be installed prior to one year after the issuance of the WNP-2 Operating License.~~

** Shield walls and window identified in items ~~3,~~ 5, 6, 7, 8, and 9 will be installed if the associated radiation levels at these locations exceed 2.5mR/hr as dictated by the ongoing ALARA reviews.

APPENDIX B

TO FACILITY OPERATING LICENSE NO. NPF-21

ENERGY NORTHWEST

COLUMBIA GENERATING STATION

DOCKET NO. 50-397

ENVIRONMENTAL PROTECTION PLAN

(NONRADIOLOGICAL)

significant increase in any adverse environmental impact previously evaluated in the FES-OL, environmental impact appraisals, or in any decisions of the Atomic Safety and Licensing Board; or (2) a significant change in effluents or power level ~~[in accordance with 10 CFR Part 51.5(b)(2)]~~ or (3) a matter, not previously reviewed and evaluated in the documents specified in (1) of this Subsection, which may have a significant adverse environmental impact.

The licensee shall maintain records of changes in facility design or operation and of tests and experiments carried out pursuant to this Subsection. These records shall include written evaluations which provide bases for the determination that the change, test, or experiment does not involve an unreviewed environmental question or constitute a decrease in the effectiveness of this EPP to meet the objectives specified in Section 1.0. The licensee shall include as part of its Annual Environmental Operating Report (per Subsection 5.4.1) brief descriptions, analyses, interpretations, and evaluations of such changes, tests and experiments.

3.2 Reporting Related to the NPDES Permit and State Certification

Changes to, or renewals of, the NPDES Permit or the State certification shall be reported to the NRC within 30 days following the date the change or renewal is approved. If a permit or certification, in part or in its entirety, is appealed and stayed, the NRC shall be notified within 30 days following the date the stay is granted.

APPENDIX C

~~ADDITIONAL CONDITIONS~~ Deleted

~~FACILITY OPERATING LICENSE NO. NPF-21~~

~~Energy Northwest shall comply with the following conditions on the schedules noted below:~~

~~Amendment Number~~	~~Additional Condition~~	~~Implementation Date~~
~~149~~	~~The licensee shall relocate certain technical specification requirements to licensee-controlled documents as described below. The location of these requirements shall be retained by the licensee.~~ ~~a. This license condition approves the relocation of certain technical specification requirements to licensee-controlled documents (e.g., UFSAR, LCS, etc.), as described in Attachment 1 to the licensee's letter dated January 14, 1997. The approval is documented in the staff's safety evaluation dated March 4, 1997.~~	~~Implementation shall be completed by June 30, 1997.~~
~~149~~	~~Regulatory Guide 1.160 commitments as described in Attachment 1 to the licensee's letter dated January 14, 1997.~~	~~Implementation shall be completed 90 days from the date of issuance of Amendment 149.~~
~~151~~	~~To ensure sufficiently conservative SPC 9X9-9 OLMCPRs, the calculation of ΔCPR will include a conservative adder based on the variability observed in the US96A7 comparison with the ANFB correlation. This adder will be at a minimum, the greater of two times the standard deviation in the mean error of the predictions relative to the calculated matrix values, or a factor of 0.975 applied to the ΔCPR calculation, and will be independent of the 0.975 factor included in the US96A7 correlation as a conservative bias to the US96A7 predictions of CPR for the SPC fuel.~~	~~Implementation shall be completed prior to exceeding 25% power for Cycle 13.~~

~~Amendment Number~~	~~Additional Condition~~	~~Implementation Date~~
~~153~~	~~This amendment authorizes the licensee to incorporate in the Final Safety Analysis Report (FSAR) certain changes to the description of the facility. Implementation of this amendment is the incorporation of these changes as described in the licensee's application dated April 16, 1998, as supplemented by letters dated April 28, 1998, and May 8, 1998, and evaluated in the staff's Safety Evaluation dated May 21, 1998.~~	~~90 days from the date of issuance.~~
~~153~~	~~This amendment is conditioned on the licensee completing the commitments regarding inspection of ECCS suppression pool screen material coupons as described in the licensee's supplemental letter dated April 28, 1998, and evaluated in the staff's Safety Evaluation dated May 21, 1998.~~	~~Refueling Outage R-14.~~

(3) Pursuant to the Act and 10 CFR Parts 30, 40 and 70, to receive, possess, and use at any time any byproduct, source and special nuclear material as sealed neutron sources for reactor startup, sealed sources for reactor instrumentation and radiation monitoring equipment calibration, and as fission detectors in amounts as required;

(4) Pursuant to the Act and 10 CFR Parts 30, 40 and 70, to receive, possess, and use in amounts as required any byproduct, source of special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus or components; and

(5) Pursuant to the Act and 10 CFR Parts 30, 40 and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility.

(6) Pursuant to the Act and 10 CFR Parts 30, 40 and 70, to store byproduct, source and special nuclear materials not intended for use at Columbia Generating Station. The materials shall be no more than 9 sealed neutron radiation sources designed for insertion into pressurized water reactors and no more than 40 sealed beta radiation sources designed for use in area radiation monitors. The total inventory shall not exceed 24 microcuries of strontium-90, 20 microcuries of uranium-235, 30 curies of plutonium-238, and 3 curies of americium-241.

C. This license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations set forth in 10 CFR Chapter I and is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

(1) Maximum Power Level

The licensee is authorized to operate the facility at reactor core power levels not in excess of full power (3486 megawatts thermal).

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment ~~XXX~~ 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.

a. For Surveillance Requirements (SRs) not previously performed by existing SRs or other plant tests, the requirement will be considered met on the implementation date and the next required test will be at the interval specified in the Technical Specifications as revised in Amendment No. 149.

(3) Deleted.

(4) Deleted.

(5) Deleted.

---

*The parenthetical notation following the title of many license conditions denotes the section of the Safety Evaluation Report and/or its supplements wherein the license condition is discussed.

(6) Deleted.

(7) Deleted.

(8) Deleted.

(9) Deleted.

(10) Deleted.

(11) Shield Wall Deferral (Section 12.3.2, SSER #4, Licensee Amendment #7)

The licensee shall complete construction of the deferred shield walls and window as identified in Attachment 3, as amended by this license amendment.

(12) Deleted.

(13) Deleted.

(14) Fire Protection Program (Generic Letter 86-10)

The licensee shall implement and maintain in effect all provisions of the approved fire protection program as described in Section 9.5.1 and Appendix F of the Final Safety Analysis Report (FSAR) for the facility thru Amendment #39 and as described in subsequent letters to the staff through November 30, 1988, referenced in the May 22, 1989 safety evaluation and in other pertinent sections of the FSAR referenced in either Section 9.5.1 or Appendix F and as approved in the Safety Evaluation Report issued in March 1982 (NUREG 0892) and in Supplements 3, issued in May 1983, and 4, issued in December 1983, and in safety evaluations issued with letters dated November 11, 1987 and May 22, 1989 subject to the following provision:

The license may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

- 6a -

(15) Deleted.

(16) Deleted.

(17) Deleted.

(18) Deleted.

(19) Deleted.

(20) Deleted.

(21) Deleted.

(22) Deleted.

(23) Deleted.

(24) Deleted.

(25) Deleted.

(26) Deleted.

(27) Deleted.

(28) Deleted.

(29) Protection of the Environment (FES)

Before engaging in additional construction or operational activities which may result in a significant adverse environmental impact that was not evaluated or that is significantly greater than the evaluation in the Final Environmental Statement the licensee shall provide a written notification to the Director of the Office of Nuclear Reactor Regulation and receive written approval from that office before proceeding with such activities.

(30) Deleted.

Attachment 1
Deleted

Attachment 2
Deleted

LIST OF SHIELD WALLS

1. Deleted.

2. Deleted.

3. Deleted.

4. Deleted.

**5. FSAR Figure 12.3-12, Zone G-9 - The access blockout to the duplicate centrifuge room.

**6. FSAR Figure 12.3-12, Zone F-9 - Same as above for the duplicate centrifuge.

**7. FSAR Figure 12.3-13, Zone J-5 - The blockout for one of the two decon concentrators.

**8. FSAR Figure 12.3-11, Zone D-8 - The two block walls at the north end of the truck loading bay.

**9. FSAR Figure 12.3-11, Zone E-8 - The leaded glass viewing window in the radwaste area.

** Shield walls and window identified in items 5, 6, 7, 8, and 9 will be installed if the associated radiation levels at these locations exceed 2.5mR/hr as dictated by the ongoing ALARA reviews.

APPENDIX B

TO FACILITY OPERATING LICENSE NO. NPF-21

ENERGY NORTHWEST

COLUMBIA GENERATING STATION

DOCKET NO. 50-397

ENVIRONMENTAL PROTECTION PLAN

(NONRADIOLOGICAL)

significant increase in any adverse environmental impact previously evaluated in the FES-OL, environmental impact appraisals, or in any decisions of the Atomic Safety and Licensing Board; or (2) a significant change in effluents or power level or (3) a matter, not previously reviewed and evaluated in the documents specified in (1) of this Subsection, which may have a significant adverse environmental impact.

The licensee shall maintain records of changes in facility design or operation and of tests and experiments carried out pursuant to this Subsection. These records shall include written evaluations which provide bases for the determination that the change, test, or experiment does not involve an unreviewed environmental question or constitute a decrease in the effectiveness of this EPP to meet the objectives specified in Section 1.0. The licensee shall include as part of its Annual Environmental Operating Report (per Subsection 5.4.1) brief descriptions, analyses, interpretations, and evaluations of such changes, tests and experiments.

3.2 Reporting Related to the NPDES Permit and State Certification

Changes to, or renewals of, the NPDES Permit or the State certification shall be reported to the NRC within 30 days following the date the change or renewal is approved. If a permit or certification, in part or in its entirety, is appealed and stayed, the NRC shall be notified within 30 days following the date the stay is granted.

Appendix C
Deleted