



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

May 24, 2011

Mr. David A Swank, Vice President,
Engineering
Columbia Generating Station
Energy Northwest
MD PE23
P.O. Box 968
Richland, WA 99352-0968

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION FOR THE REVIEW OF THE
COLUMBIA GENERATING STATION, LICENSE RENEWAL APPLICATION
FOR OPERATING EXPERIENCE (TAC NUMBER ME3058)

Dear Mr. Gambhir:

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

Items in the enclosure were discussed with Abbas Mostala and a mutually agreeable date for the response is within 30 days from the date of this letter. If you have any questions, please contact me at 301-415-3897 or by e-mail at arthur.cunanan@nrc.gov.

Sincerely,

A handwritten signature in black ink, appearing to be "A. Cunanan", written over a horizontal line.

Arthur D. Cunanan, Project Manager
Projects Branch 1
Division of License Renewal
Office of Nuclear Reactor Regulation

Docket No. 50-397

Enclosure:
As stated

cc w/encl: Distribution via Listserv

COLUMBIA GENERATING STATION
LICENSE RENEWAL APPLICATION
REQUEST FOR ADDITIONAL INFORMATION

RAI B.1.4-1

Background

Pursuant to 10 CFR 54.21(a)(3), a license renewal applicant is required to demonstrate that the effects of aging on structures and components subject to an aging management review are adequately managed so that their intended functions will be maintained consistent with the current licensing basis for the period of extended operation. Section 3.0.1 of NUREG-1800, "Standard Review Plan for Review of License Renewal Applications for Nuclear Power Plants," Revision 2 (SRP-LR), defines an aging management review as the identification of the materials, environments, aging effects, and aging management programs (AMPs) credited for managing the aging effects. In turn, SRP-LR Section A.1.2.3 defines an acceptable AMP as consisting of ten elements. Element 10, "Operating Experience," in part, is described in SRP-LR Section A.1.2.3.10, paragraph 1, as follows:

Consideration of future plant-specific and industry operating experience relating to aging management programs should be discussed. Reviews of operating experience by the applicant in the future may identify areas where aging management programs should be enhanced or new programs developed. An applicant should commit to a *future review of plant-specific and industry operating experience to confirm the effectiveness of its aging management programs or indicate a need to develop new aging management programs* (emphasis added). This information should provide objective evidence to support the conclusion that the effects of aging will be managed adequately so that the structure and component intended function(s) will be maintained during the period of extended operation.

In addition, 10 CFR 54.21(d) requires the application to contain a final safety analysis report (FSAR) supplement. This supplement must contain a summary description of the programs and activities for managing the effects of aging and the evaluation of time-limited aging analyses for the period of extended operation.

Based on its review of the Columbia Generating Station license renewal application (LRA), the staff determined that Section B.1.4 provides a general description of how the applicant gathered and considered operating experience in preparing its LRA, and Sections B.2.1 through B.2.53 summarize the specific operating experience considered for each AMP.

Issue

Although LRA Sections B.1.4 and B.2.1 through B.2.53 describe how the applicant incorporated operating experience into its AMPs, they do not fully describe how the applicant will use future operating experience to ensure that the AMPs will remain effective for managing the aging effects during the period of extended operation. The majority of the program descriptions contain statements indicating that future operating experience will be used to adjust the

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programs as appropriate; however, the details of this process are not fully described. Also, some program descriptions contain no such statements and, for these AMPs, it is not clear whether the applicant currently has or intends to implement actions to monitor operating experience on an ongoing basis and use it to ensure the continued effectiveness of the AMPs. In addition, the LRA does not state whether new AMPs will be developed, as necessary. Further, none of AMP descriptions provide the staff reasonable assurance that ongoing operating experience reviews will continue to inform AMP updates for license renewal.

Request

Describe the programmatic activities that will be used to continually identify aging issues, evaluate them, and, as necessary, enhance the AMPs or develop new AMPs for license renewal. In this description, address the following:

- a) Describe the sources of plant-specific and industry operating experience that are monitored on an ongoing basis to identify potential aging issues. Indicate whether these plant-specific sources require monitoring: corrective action program, system health reports, licensee event reports (LERs), and the results of inspections performed under the AMPs. Similarly, indicate whether these industry sources require monitoring: vendor recommendations, revisions to industry standards on which the AMPs are based, LERs from other plants, NRC Bulletins, Generic Letters, Regulatory Issue Summaries, Information Notices, Regulatory Guides, License Renewal Interim Staff Guidance, and revisions to NUREG-1801, "Generic Aging Lessons Learned (GALL) Report." Describe the criteria used to classify a particular piece of information as aging related and outline the training provided to plant personnel so that they can adequately make such classifications.
- b) Describe how the identified aging issues are further evaluated to determine their potential impact on the plant aging management activities. Indicate whether the affected structures and components and their materials, environments, aging effects, aging mechanisms, and AMPs are identified and documented consistent with the methods used to prepare the LRA. Describe how the results of AMP inspections are considered to adjust the frequency of future inspections, establish new inspections, and ensure an adequate depth and breadth of component, material, environment, and aging effect combinations. Describe the records of these evaluations and indicate whether they are maintained in an auditable and retrievable form.
- c) Describe the process and criteria used to ensure that the identified enhancements are implemented in a timely manner.
- d) Describe the administrative controls over these programmatic activities.

Provide a summary description of these activities for the FSAR supplement required by 10 CFR 54.21(d). If enhancements for license renewal are necessary, also provide the updates for the FSAR supplement.

If such an operating experience program is determined to be unnecessary, provide a detailed explanation of the bases for this determination.

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Sincerely,
/RA Bo Pham for/
rthur D. Cunanan, Project Manager
Projects Branch 1
Division of License Renewal
Office of Nuclear Reactor Regulation

Docket No. 50-397

Enclosure:

As stated

cc w/encl: Distribution via Listserv

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Letter to D. Swank from A. Cunanan dated May 24, 2011

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