



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

September 30, 2011

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

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION FOR THE REVIEW OF THE  
COLUMBIA GENERATING STATION, LICENSE RENEWAL APPLICATION  
REGARDING OPERATING EXPERIENCE (TAC NO. ME3058)

Dear Mr. Swank:

By letter dated January 19, 2010, Energy Northwest submitted an application pursuant to Title 10 of the *Code of Federal Regulations* 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](mailto:arthur.cunanan@nrc.gov).

Sincerely,

A handwritten signature in black ink that reads "Arthur Cunanan".

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: Listserv

COLUMBIA GENERATING STATION  
LICENSE RENEWAL APPLICATION  
REQUEST FOR ADDITIONAL INFORMATION

**RAI B.1.4-2**

Background

In request for additional information (RAI) B.1.4-1 issued on May 24, 2011, the staff asked the applicant to describe the programmatic activities that will be used to continually identify aging issues, evaluate them and, as necessary, enhance the aging management programs (AMPs) or develop new AMPs for license renewal. In its response dated June 23, 2011, and later revised in a letter dated July 11, 2011, the applicant stated that it will use its current corrective action program (CAP) and operating experience program (OEP) to continually monitor and evaluate plant-specific and industry operating experience related to aging.

Issue

In its response, as revised, the applicant provided a general description of the processes used to evaluate operating experience on an ongoing basis; however, the applicant did not provide specifics on how aging-related issues are addressed under these processes. Specifically, the applicant did not address the following items:

- (a) The applicant did not describe a means for identifying and categorizing operating experience items as related to aging.
- (b) The applicant did not describe how evaluations of operating experience items related to aging consider the fundamental components of an aging management review, which are the following:
  - systems, structures, or components
  - materials
  - environments
  - aging effects
  - aging mechanisms
  - AMP(s)
- (c) The applicant did not describe training requirements specific to aging issues for those plant personnel responsible for screening, evaluating, and submitting operating experience items.
- (d) The applicant did not describe how it will consider as operating experience the results of the AMP inspections.

ENCLOSURE

- (e) The applicant stated that it does not consider certain guidance documents to be sources of operating experience. However, the staff believes that the content of the document, not the source, is the most important consideration. Guidance documents, such as NUREG-1801, "Generic Aging Lessons Learned (GALL) Report," provide a convenient source of operating experience information, useful recommendations, and best practices. As such, the staff believes there is significant value in considering new guidance applicable to aging management. An effective operating experience program should include a broad range of inputs and, therefore, it is inappropriate to exclude consideration of specific issues in guidance documents.
- (f) The applicant stated that, under the OEP, supervisors are responsible for ensuring the timely completion of operating experience evaluations; however, the applicant provided no additional detail on what constitutes a timely evaluation.

### Request

Respond to each item below for both the CAP and OEP:

- (a) Describe how operating experience issues will be identified and categorized as related to aging.
- (b) Describe how evaluations of operating experience issues related to aging will consider the following:
- systems, structures, or components
  - materials
  - environments
  - aging effects
  - aging mechanisms
  - AMP(s)
- (c) Describe the training requirements on aging issues for those plant personnel responsible for screening, evaluating, and submitting operating experience items.
- (d) Describe how the results of the AMP inspections will be reviewed.
- (e) Provide a plan for considering the content of guidance documents, such as the GALL Report, as operating experience applicable to aging management programs.
- (f) Describe what constitutes a timely evaluation under the OEP.

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Sincerely,  
**/RA/**  
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: Listserv

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\*concurrence via e-mail

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NAME	SFiguroa	ACunanan	DMorey	SFiguroa	ACunanan
DATE	9/29/2011	9/29/2011	9/30/11	9/29/2011	9/30/11

OFFICIAL RECORD COPY

Letter to David A. Swank from Arthur D. Cunanan dated September 30, 2011

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                  COLUMBIA GENERATING STATION, LICENSE RENEWAL APPLICATION  
                  REGARDING OPERATING EXPERIENCE (TAC NO. ME3058)**

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