



ENERGY NORTHWEST

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GO2-11-203

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

Subject: **COLUMBIA GENERATING STATION, DOCKET NO. 50-397
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION
LICENSE RENEWAL APPLICATION**

- References:
- 1) Letter, GO2-10-11, dated January 19, 2010, WS Oxenford (Energy Northwest) to NRC, "License Renewal Application"
 - 2) Letter dated May 24, 2011, NRC to DA Swank (Energy Northwest), "Request for Additional Information for the Review of the Columbia Generating Station, License Renewal Application," (ADAMS Accession No. ML11138A323)
 - 3) Letter dated November 10, 2011, DA Swank (Energy Northwest) to NRC, "Response to Request for Additional Information License Renewal Application," (GO2-11-180)

Dear Sir or Madam:

By Reference 1, Energy Northwest requested the renewal of the Columbia Generating Station (Columbia) operating license. Via Reference 2, the Nuclear Regulatory Commission (NRC) requested additional information related to the Energy Northwest submittal. This was the first of several requests for additional information (RAIs) and conversations pertaining to the use of operating experience (OE) at Columbia. Reference 3 provided the most recent response from Energy Northwest regarding the topic of OE at Columbia. Following further conversations with Mr. Arthur Cunanan, NRC License Renewal Project Manager, and other NRC staff members, Energy Northwest revises the response to RAI B.1.4-2 provided in Reference 3 to add information requested by the staff.

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As stated in Reference 3, all operating experience is currently being screened for aging of long lived passive structures or components and further evaluation, as applicable, by personnel trained in the requirements of license renewal scoping, screening, and aging management reviews (aging effects and mechanisms). Thus, when the FSAR supplement is incorporated upon receipt of renewed license these statements will accurately describe the review of operating experience for aging of long lived passive structures or components.

Activities that still require further action are issuance of the license renewal implementation procedure and periodic training for identification of aging issues for the appropriate plant personnel such as system engineers, equipment operators and maintenance personnel.

The License Renewal Implementation procedure is to be issued prior to receipt of the renewed license. Thus, the FSAR supplement will be accurate with regard to the activities that will be governed by this procedure at the time the supplement is incorporated into the FSAR.

Periodic training for identification of aging issues for appropriate plant personnel is addressed by the revised FSAR supplement provided under amendment 50. This training is based on information provided in the EPRI aging assessment guide. The wording in the supplement is similar to existing wording in the Columbia FSAR chapter 13 with regard to other continuing or periodic training received by plant personnel. Thus, when the FSAR supplement is incorporated upon receipt of renewed license these statements will also accurately describe the periodic training received by plant personnel with regard to identification of aging issues.

Transmitted herewith is Amendment 50 to the Columbia License Renewal Application which provides the additional information requested by the NRC staff. There are no new or revised commitments contained in this letter.

If you have any questions or require additional information, please contact John Twomey at (509) 377-4678.

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

Respectfully,

Handwritten signature of AL Javorik in cursive script, followed by the word "For" in a simple font.

AL Javorik
Vice President, Engineering

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Enclosure 1: License Renewal Application Amendment 50

cc: NRC Region IV Administrator
NRC NRR Project Manager
NRC Senior Resident Inspector/988C
EFSEC Manager
RN Sherman – BPA/1399
WA Horin – Winston & Strawn
AD Cunanan - NRC NRR (w/a)
MA Galloway – NRC NRR
RR Cowley – WDOH

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Enclosure 1

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**LICENSE RENEWAL APPLICATION
AMENDMENT 50**

Section Number	Page Number	RAI Number
A.1.2	A-8a	Editorial
A.1.2	A-8b	Supplement
A.1.2	A-8c	Supplement

Insert A:

~~Internal and external operating experience is reviewed in accordance with the QQAPD. The review assures the existing, new, and any future required aging management programs necessary to provide reasonable assurance that components within the scope of license renewal will continue to perform their intended functions consistent with the current licensing basis (CLB) for the period of extended operation.~~



The existing Corrective Action Program and the Operating Experience Program ensure, through the continual review of both plant-specific and industry operating experience, that the license renewal aging management programs are effective to manage the aging effects for which they are credited. The aging management programs are either enhanced or new programs are developed when the review of operating experience indicates that the aging management programs may not be effective. For each aging management program listed in this section, operating experience is reviewed on a continuing basis.

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A-8b




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The processes and procedures for the review of operating experience address the following points:

- All operating experience is screened for aging of long lived passive structures or components and further evaluation as applicable is performed by personnel trained in the requirements of license renewal scoping, screening, and aging management reviews (aging effects and mechanisms). The evaluation is completed and prioritized commensurate with the potential significance of the issue. Such evaluations are documented and retained in an auditable and retrievable form.
- When it is determined that enhancements are necessary to adequately manage the effects of aging, the enhancements are entered into and implemented consistent with the plant corrective action program or operating experience program, as applicable. Enhancements can include, as appropriate, modifications to AMPs or the creation and implementation of new AMPs.
- Operating experience that is related to aging of long lived passive structures or components is keyword tagged "Aging."
- The processes are adequate so as to not preclude the consideration of operating experience related to aging management. The processes appropriately gather information on all structures and components within the scope of license renewal, and their materials, environments, aging effects, and aging mechanisms. In addition, the processes include the AMPs credited for managing the effects of aging, and the activities under these AMPs (e.g., inspection methods, preventive actions, evaluation techniques, etc.).
- While the programs and procedures may specify reviews of certain sources of information, such as NRC generic communications and Institute of Nuclear Power Operations reports, they allow for any potential source of relevant plant-specific or industry operating experience information.
- AMP owners review data collected by the AMPs, utilize the corrective action program for any conditions that are unsatisfactory to ensure they will be addressed and corrected, maintain required records for the program and maintain the program current and implement revisions as needed based on program results and internal or external operating expectance.
- Provide guidance on sharing internal operating experience related to license renewal issues with the industry.

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page A-8c



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- Periodic training for system engineers, equipment operators and maintenance personnel specific to identifying aging issues.
- The License Renewal program lead is trained in the requirements of license renewal scoping, screening, and aging management reviews (aging effects and mechanisms).
- Aging management program owners are trained in the requirements of license renewal scoping, screening, and aging management reviews (aging effects and mechanisms) associated with their particular aging management program.