



Robert E Schuetz
Vice President, Operations
P.O. Box 968, Mail Drop PE23
Richland, WA 99352-0968
Ph. 509-377-2425 F. 509-377-4674
reschuetz@energy-northwest.com

October 29, 2015
GO2-15-145

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
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION (RAI) 3
ON LICENSE AMENDMENT REQUEST FOR ADOPTION OF
TECHNICAL SPECIFICATION TASK FORCE (TSTF)-425, REVISION 3**

- References:
1. Letter, GO2-15-007, dated March 17, 2015, WG Hettel (Energy Northwest) to NRC, "License Amendment Request for Adoption of Technical Specification Task Force Traveler (TSTF)-425, Revision 3
 2. Email, dated August 12, 2015, Balwant Singal (NRC) to Lisa Williams (Energy Northwest), "Request for Additional Information – License Amendment Request for Adoption of TSTF-425, Revision [3], Columbia Generating Station – TAC No. MF6042"
 3. Letter, GO2-15-128, dated September 17, 2015, RE Schuetz (Energy Northwest) to NRC, "Response to Request for Additional Information on License Amendment Request for Adopt Technical Specification Task Force (TSTF)-425, Revision 3"

Dear Sir or Madam:

By Reference 1, Energy Northwest submitted for approval the License Amendment Request (LAR) to adopt TSTF-425, Revision 3.

Via Reference 2, the Nuclear Regulatory Commission (NRC) submitted Requests for Additional Information (RAIs) to Energy Northwest for response.

**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION (RAI) 3 ON LICENSE
AMENDMENT REQUEST FOR ADOPTION OF TECHNICAL SPECIFICATION TASK
FORCE (TSTF)-425, REVISION 3**

Page 2 of 2

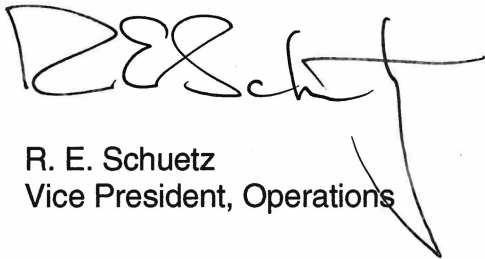
Via Reference 3, Energy Northwest submitted response to Reference 2 except RAI 3.
Attachment 1 provides the requested information for RAI 3.

This letter and its attachment contain no regulatory commitments.

If there are any questions or if additional information is needed, please contact Ms. L. L.
Williams, Licensing Supervisor, at 509-377-8148.

I declare under penalty of perjury that the foregoing is true and correct. Executed this
29 day of Oct, 2015.

Respectfully,

A handwritten signature in black ink, appearing to read "R. E. Schuetz". The signature is written in a cursive style with a long, sweeping tail that extends downwards and to the right.

R. E. Schuetz
Vice President, Operations

Attachments: As Stated.

cc: NRC Region IV Administrator
NRC NRR Project Manager
NRC Sr. Resident Inspector - 988C
CD Sonoda - BPN1399 (email)
WA Horin - Winston & Strawn
RR Cowley -WDOH (email)
EFSECutc.wa.gov-- EFSEC (email)

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION (RAI) 3 ON LICENSE AMENDMENT REQUEST FOR ADOPTION OF TECHNICAL SPECIFICATION TASK FORCE (TSTF)-425, REVISION 3

Attachment 1

Page 1 of 1

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION (RAI) 3

NRC Request

3. The impact of the open [Findings and Observations] F&O for supporting requirement (SR) SY-A4 states that sensitivity analysis will be performed. It is not clear how a sensitivity analysis could be defined to address the lack of documented interviews that confirm that system analyses represent the as-built, as-operated plant. The TSTF-425 program considers capability category II for the internal events PRA model; therefore, please address this F&O to meet capability category II and provide the disposition of the F&O.

Energy Northwest Response:

Open F&O 2-14 as documented in the August 2009 peer review is as follows:

“Interviews with plant system engineers or operators have not been documented and cannot be verified by the peer review team. Original interviews were performed for the original IPE.

System and operations change over time, and the system engineers and operators should be consulted with regard to system models.

(This F&O originated from [supporting requirement] SR SY-A4)”

The open F&O, 2-14, for SR SY-A4 has been resolved to meet capability category (CC) CC-II for SY-A4. Finding 2-14 was resolved as part of the risk-informed technical specification initiative 5b license amendment request. System reviews with the system engineers were completed for all PRA systems with a focus on confirming that the PRA system analyses correctly reflect the as-built, as-operated plant, as well as to discuss recent operating history and any problems in system operation. The interviews and reviews were documented, and this documentation will be added to the system notebooks in the next PRA update. Discrepancies identified by the system engineer interviews had no impact on the PRA modeling and were documentation-related only, with the exception of two modeling conservatisms related to the Reactor Feedwater system model and the Standby Liquid Control (SLC) model. The first model conservatism is the current Reactor Feedwater system PRA model only has two paths modeled for possible injection into the vessel when there are three possible paths. The second model conservatism is the current SLC system PRA model contains a component failure event that, based on system design, is conservative. Both of these modeling conservatisms do not have a risk-significant impact on the PRA results.