



William G. Hettel  
Vice President, Operations  
P.O. Box 968, Mail Drop PE23  
Richland, WA 99352-0968  
Ph. 509-377-8311 F. 509-377-4674  
wghettel@energy-northwest.com

June 22, 2016  
GO2-16-085

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 THIRD REQUEST FOR ADDITIONAL INFORMATION  
(RAI) RELATED TO AN AMENDMENT TO ADOPT TECHNICAL  
SPECIFICATION TASK FORCE (TSTF)-425, REVISION 3 TO  
RELOCATE SPECIFIC SURVEILLANCE FREQUENCIES TO A  
LICENSEE CONTROLLED PROGRAM**

- References:
1. Letters from Energy Northwest to NRC, dated March 17, 2015 (ADAMS Accession Number ML15093A178), September 17, 2015 (ADAMS Accession Number ML15260A570), October 29, 2015 (ADAMS Accession Number ML15302A492), and April 7, 2016, (ADAMS Accession Number ML160984A387)
  2. Emails from NRC to Energy Northwest, dated August 12, 2015 (ADAMS Accession Number ML15224B646), March 9, 2016 (ADAMS Accession Number ML16069A359), and May 31, 2016, (ADAMS Accession Number not yet assigned)

Dear Sir or Madam:

The Reference 1 letters submitted and supplemented a License Amendment Request (LAR) by Energy Northwest for Columbia Generating Station (Columbia) to Adopt Technical Specification Task Force (TSTF)-425, Revision 3 to Relocate Specific Surveillance Frequencies to a Licensee Controlled Program. The Reference 2 emails transmitted three sets of Requests for Additional Information (RAI) questions from the Nuclear Regulatory Commission (NRC) related to Energy Northwest's probabilistic risk assessment (PRA) model in relation to the subject LAR.

In response to Reference 2 email dated May 31, 2016 (ADAMS Accession Number not yet assigned) Energy Northwest is submitting as Attachment 1, its response to the Third Request for Additional Information related to an Amendment to Adopt Technical Specification Task Force (TSTF)-425, Revision 3 to Relocate Specific Surveillance Frequencies to a Licensee Controlled Program.

The No Significant Hazards Consideration Determination (NSHCD) provided in the original submittal is not altered by this submittal. 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 20 day of June, 2016.

Respectfully,



W.G. Hettel  
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 SECOND REQUEST FOR ADDITIONAL INFORMATION**

**NRC Request:**

The licensee is asked to resubmit the response to RAI question PRA RAI 1.1 a) submitted to the licensee on March 9, 2017 which states;

a. The peer review F&O 1-3 states “In almost all of the post-initiator Human Error Probabilities (HEPs) where optimal stress is assumed, time is a factor with core damage occurring between 30 minutes and an hours.”

Clarify if these post-initiator HEPs were assumed to be optimal stress in all cases involving this time frame or if such HEPs were determined on a case-by-case basis to represent optimal stress or high stress as appropriate. Please describe your process to make this determination.

**Energy Northwest Response:**

These post-initiator HEP's were not assumed to be optimal stress in all cases, including the time frame of 30 minutes and an hour.

Post-initiators HEP stress levels were determined on a case-by-case basis to represent optimal (Low), moderate stress or high stress as appropriate, including those where time is a factor with core damage occurring between 30 minutes and an hour. The determination of stress was made using the Execution Stress decision tree in the Human Reliability Analysis (HRA) Calculator.