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July 10, 2017  
GO2-17-123

10 CFR 50.73

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

Subject: **COLUMBIA GENERATING STATION, DOCKET NO. 50-397  
LICENSEE EVENT REPORT NO. 2017-002-00**

Dear Sir or Madam:

Transmitted herewith is Licensee Event Report No. 2017-002-00 for Columbia Generating Station. This report is submitted pursuant to 10 CFR 50.73(a)(2)(i)(B).

There are no commitments being made to the Nuclear Regulatory Commission herein. If you have any questions, or require additional information, please contact Ms. D. M. Wolfgramm, Regulatory Compliance Supervisor, at (509) 377-4792.

Executed on this 10 day of July, 2017

Respectfully,

A handwritten signature in blue ink, appearing to read "W. G. Hettel", with a stylized flourish at the end.

W. G. Hettel  
Vice President, Operations

Enclosure 1: Licensee Event Report 2017-002-00

cc: NRC Region IV Administrator  
NRC NRR Project Manager  
NRC Senior Resident Inspector/988C  
CD Sonoda – BPA/1399  
WA Horin – Winston & Strawn



**LICENSEE EVENT REPORT (LER)**

(See Page 2 for required number of digits/characters for each block)

(See NUREG-1022, R.3 for instruction and guidance for completing this form  
<http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1022/r3/>)

Estimated burden per response to comply with this mandatory collection request: 80 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the FOIA, Privacy and Information Collections Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by e-mail to [Infocollects.Resource@nrc.gov](mailto:Infocollects.Resource@nrc.gov), and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

**1. FACILITY NAME**

Columbia Generating Station

**2. DOCKET NUMBER**

05000 397

**3. PAGE**

1 OF 3

**4. TITLE**

Implementation of Enforcement Guidance Memorandum 11-003, Revision 3

5. EVENT DATE			6. LER NUMBER			7. REPORT DATE			8. OTHER FACILITIES INVOLVED	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV NO.	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
05	16	2017	2017	002	00	7	10	2017		05000
										05000

9. OPERATING MODE	11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check all that apply)			
5	<input type="checkbox"/> 20.2201(b)	<input type="checkbox"/> 20.2203(a)(3)(i)	<input type="checkbox"/> 50.73(a)(2)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)
	<input type="checkbox"/> 20.2201(d)	<input type="checkbox"/> 20.2203(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(ii)(B)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)
	<input type="checkbox"/> 20.2203(a)(1)	<input type="checkbox"/> 20.2203(a)(4)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(ix)(A)
	<input type="checkbox"/> 20.2203(a)(2)(i)	<input type="checkbox"/> 50.36(c)(1)(i)(A)	<input type="checkbox"/> 50.73(a)(2)(iv)(A)	<input type="checkbox"/> 50.73(a)(2)(x)
10. POWER LEVEL  000	<input type="checkbox"/> 20.2203(a)(2)(ii)	<input type="checkbox"/> 50.36(c)(1)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(v)(A)	<input type="checkbox"/> 73.71(a)(4)
	<input type="checkbox"/> 20.2203(a)(2)(iii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(v)(B)	<input type="checkbox"/> 73.71(a)(5)
	<input type="checkbox"/> 20.2203(a)(2)(iv)	<input type="checkbox"/> 50.46(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(v)(C)	<input type="checkbox"/> 73.77(a)(1)
	<input type="checkbox"/> 20.2203(a)(2)(v)	<input type="checkbox"/> 50.73(a)(2)(i)(A)	<input type="checkbox"/> 50.73(a)(2)(v)(D)	<input type="checkbox"/> 73.77(a)(2)(i)
	<input type="checkbox"/> 20.2203(a)(2)(vi)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)(B)	<input type="checkbox"/> 50.73(a)(2)(vii)	<input type="checkbox"/> 73.77(a)(2)(ii)
	<input type="checkbox"/> 50.73(a)(2)(i)(C)	<input type="checkbox"/> OTHER	Specify in Abstract below or in NRC Form 366A	

**12. LICENSEE CONTACT FOR THIS LER**

LICENSEE CONTACT: Tracey Parmelee, Principal Engineer, Compliance  
TELEPHONE NUMBER (Include Area Code): (509) 377-8395

**13. COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT**

CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX

14. SUPPLEMENTAL REPORT EXPECTED	15. EXPECTED SUBMISSION DATE	MONTH	DAY	YEAR
<input type="checkbox"/> YES (If yes, complete 15. EXPECTED SUBMISSION DATE) <input checked="" type="checkbox"/> NO				

**ABSTRACT** (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines)

The condition reported by this Licensee Event Report (LER) was an expected condition as a result of planned activities in support of a routine refueling outage. As described in the LER, the Nuclear Regulatory Commission (NRC) has provided enforcement guidance, applicable to boiling water reactors, that allows the reported condition. Although this allowance is provided by the NRC's enforcement guidance, this condition is considered reportable in accordance with 10 CFR 50.73(a)(2)(i)(B) as a condition prohibited by Technical Specifications.

Between May 16, 2017 and June 15, 2017, Energy Northwest performed operations with the potential for draining the reactor vessel (OPDRV) activities while in Mode 5 without an operable secondary containment. Although this was an expected condition, and is allowed by Enforcement Guidance Memorandum 11-003, Revision 3, these activities resulted in a condition prohibited by Technical Specification 3.6.4.1. The OPDRV activities were planned and completed under the guidance of plant procedures and work instructions, and are considered to have low safety significance based on the interim actions taken. Since this condition was an expected result of these actions, cause determination is not necessary. Energy Northwest will submit a license amendment request to adopt Technical Specification Task Force Traveler 542 associated with generic resolution of this issue.



**LICENSEE EVENT REPORT (LER)  
CONTINUATION SHEET**

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1. FACILITY NAME  Columbia Generating Station	05000-	2. DOCKET NUMBER  397	3. LER NUMBER		
			YEAR  2017	SEQUENTIAL NUMBER  002	REV NO.  00

**NARRATIVE**

**PLANT CONDITIONS**

At the time of the event, the plant was in a scheduled refueling outage in Mode 5 with the reactor head de-tensioned.

**EVENT DESCRIPTION**

From May 16, 2017 to June 15, 2017, during a scheduled refueling outage, planned operations with the potential to drain the reactor vessel (OPDRV) activities were performed without secondary containment operable while the plant was operating in Mode 5, contrary to the requirements of Technical Specification (TS) 3.6.4.1. Energy Northwest met the provisions of Enforcement Guidance Memorandum (EGM) 11-003, Revision 3, to perform these activities. The event timeline for the planned activities is as follows:

5/16/17 2137 Pacific Daylight Time (PDT) – Commenced OPDRV window to support placing Residual Heat Removal System B (RHR-B) in Fuel Pool Cooling (FPC) assist mode.

5/16/17 2250 PDT – Commenced OPDRV for operating FPC and Cleanup System in the alternate assist mode when RHR Shutdown Cooling is not available.

5/17/17 0325 PDT – Exited OPDRV window.

5/20/17 0402 PDT – Commenced OPDRV window to support Control Rod Drive replacement.

5/21/17 0924 PDT – Exited OPDRV window.

5/29/17 0244 PDT – Commenced OPDRV window to support Reactor Recirculation System seal replacement.

5/30/17 0000 PDT – Commenced OPDRV activity to restore from operating FPC and Cleanup System in the alternate assist mode when RHR Shutdown Cooling is not available. Placed RHR-A in Shutdown Cooling.

5/31/17 1106 PDT – Exited OPDRV window.

6/1/17 0241 PDT – Commenced OPDRV window to support RHR valve re-seating.

6/1/17 0354 PDT – Exited OPDRV window.

6/8/17 1515 PDT – Commenced OPDRV window to perform the functional verification of Scram Discharge Volume instrumentation.

6/10/17 1430 PDT – Commenced OPDRV window in support of the Reactor Water Clean-Up system fill.

6/11/17 0103 PDT – Suspended OPDRV window to support the function test of the Balance of Plant Isolation Logic.

6/11/17 0227 PDT – Commenced OPDRV window in support of draining the reactor cavity.

6/11/17 0428 PDT – Exited OPDRV window.



**LICENSEE EVENT REPORT (LER)  
CONTINUATION SHEET**

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1. FACILITY NAME  Columbia Generating Station	2. DOCKET NUMBER  05000- 397	3. LER NUMBER		
		YEAR 2017	SEQUENTIAL NUMBER 002	REV NO. 00

**NARRATIVE**

**EVENT DESCRIPTION** continued

6/12/17 0435 PDT – Commenced OPDRV window to support the Reactor Pressure Vessel leakage test.

6/15/17 1017 PDT – Exited OPDRV window.

**REPORTABILITY AND SAFETY ASSESSMENT**

This event is reportable in accordance with 10 CFR 50.73(a)(2)(i)(B) as an operation or condition prohibited by TS 3.6.4.1, which prohibits performing activities identified as OPDRVs in Mode 5 while secondary containment is inoperable.

The OPDRV activities described in this report were accomplished using the interim actions provided by EGM 11-003, Revision 3. In accordance with station procedures, Energy Northwest adhered to the Nuclear Regulatory Commission plain language definition of OPDRV activities that could potentially result in draining or siphoning the reactor pressure vessel water below the top of the fuel. During all OPDRV activities, the following prerequisites were met:

1. The plant was in Mode 5 with the reactor cavity water level was maintained greater than or equal to 22 feet above the Reactor Pressure Vessel (RPV) flange.
2. Two independent means of monitoring RPV water level were available.
3. At least one Emergency Core Cooling System pump was available and capable of injecting water equal to or greater than the maximum potential leakage rate from the RPV for a minimum of four hours.
4. The size of the allowable draining path was minimized to maintain drain down time to greater than 24 hours.
5. Movement of recently irradiated fuel was prohibited.
6. OPDRV activities were prohibited during Mode 4 with secondary containment inoperable.
7. The capability to isolate a potential leakage path during OPDRV activities before the water inventory could reach the RPV flange was maintained.

The required compensatory measures were properly implemented and adequate levels of safety were provided during the performance of the OPDRV activities described in this report. Based on this information, the performance of these OPDRV activities was determined to have very low safety significance.

**CAUSE OF EVENT**

Implementation of EGM 11-003, Revision 3, interim actions during Columbia's Refueling Outage R23 was a planned activity. As such, no cause determination was performed on this condition.

**SIMILAR EVENTS**

On July 7, 2015, Energy Northwest submitted LER 2015-003-00 to report a similar occurrence. During Columbia's Refueling Outage R22, EGM 11-003, Revision 2, was utilized for OPDRV activities while secondary containment was inoperable.

**FURTHER CORRECTIVE ACTIONS**

Consistent with the guidance provided in EGM 11-003, Revision 3, Energy Northwest will submit a license amendment request to adopt Technical Specification Task Force Traveler 542, Reactor Pressure Vessel Water Inventory Control, associated with generic resolution of this issue.