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

November 15, 2017
GO2-17-194

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 SUPPLEMENT TO LICENSE AMENDMENT REQUEST TO REVISE TECHNICAL SPECIFICATIONS TO ADOPT TSTF-542, "REACTOR PRESSURE VESSEL WATER INVENTORY CONTROL"**

Reference:
1. Letter, GO2-17-038, R. E. Schuetz (Energy Northwest) to NRC, "License Amendment Request to Revise Technical Specifications to Adopt TSTF-542, "Reactor Pressure Vessel Water Inventory Control"," dated October 23, 2017 (ML17296B380)

2. Public Meeting Announcement (NRC), "Forthcoming Public Meeting between the U.S. Regulatory Commission and the Technical Specifications Task Force." Meeting date November 9, 2017 (ML17303A162)

Dear Sir or Madam:

Please replace Technical Specification (TS) markup Page 3.5.1-1 in Attachment 2 of Reference 1 with the enclosed markup TS Page 3.5.1-1. This change incorporates Columbia Generating Station (Columbia) Amendment 245 into the Reference 1 markup. Columbia Amendment 245 was issued after Reference1 was submitted. Please replace markup TS Page 3.5.2-8 in Attachment 2 of Reference 1 with the enclosed markup TS Page 3.5.2-8. This change incorporates the Technical Specification Task Force (TSTF)-542 Level 8 variation for TS Surveillance Requirement (SR) 3.5.2.8 discussed with the Nuclear Regulatory Commission (NRC) on November 9, 2017 (Reference 2).

Please replace TS clean Page 3.5.1-1 in Attachment 3 of Reference 1 with the enclosed clean TS Page 3.5.1-1. This change incorporates Columbia Amendment 245 into the Reference 1 clean pages. Please replace clean TS Page 3.5.2-6 in Attachment 3 of Reference 1 with the enclosed clean TS Page 3.5.2-6. This change incorporates the revision to TS SR 3.5.2.8 into the Reference 1 clean pages.

Please replace TS Bases markup Page B 3.5.2-14 in Attachment 4 of Reference 1 with the enclosed TS Bases markup Page B 3.5.2-14. This change is provided for information only. This change incorporates the revision to TS SR 3.5.2.8 into the Bases markup of Reference 1.

The conclusions of the No Significant Hazards Consideration determination in the original submittal are not altered by this submittal.

Pursuant to 10 CFR 50.91, a copy of this supplement is being sent to the designated official of the State of Washington.

There are no new or revised commitments with this letter.

If you should have any questions regarding this submittal, 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 15TH day of November, 2017.

Respectfully,

W.G. Hettel
Vice President, Operations

Enclosure: As stated

cc: NRC Region IV Administrator
NRC NRR Project Manager
NRC Sr. Resident Inspector - 988C
CD Sonoda – BPA 1399 (email)
WA Horin – Winston & Strawn (email)
RR Cowley – WDOH (email)
EFSECutc.wa.gov – EFSEC (email)

GO2-17-194
Enclosure

License Amendment Request to Revise Technical Specifications to Adopt TSTF-542, "Reactor Pressure Vessel Water Inventory Control"

Replacement Pages

3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS), RPV WATER INVENTORY CONTROL, AND REACTOR CORE ISOLATION COOLING (RCIC) SYSTEM

3.5.1 ECCS - Operating

LCO 3.5.1 Each ECCS injection/spray subsystem and the Automatic Depressurization System (ADS) function of six safety/relief valves shall be OPERABLE.

APPLICABILITY: MODE 1,
MODES 2 and 3, except ADS valves are not required to be OPERABLE with reactor steam dome pressure ≤ 150 psig.

ACTIONS

----------NOTE----------
LCO 3.0.4.b is not applicable to HPCS.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One low pressure ECCS injection/spray subsystem inoperable.	A.1 Restore low pressure ECCS injection/spray subsystem to OPERABLE status.	7 days[1]
B High Pressure Core Spray (HPCS) System inoperable.	B.1 Verify by administrative means RCIC System is OPERABLE when RCIC System is required to be OPERABLE. AND B.2 Restore HPCS System to OPERABLE status.	Immediately 14 days

[1] The Completion Time that one train of RHR (RHR-A) can be inoperable as specified by Required Action A.1 may be extended beyond the 7 day completion time up to 7 days to support restoration of RHR-A following pump and motor replacement. This footnote will expire at 23:59 PST February 28, 2019.

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.5.2.~~6~~8	----------NOTE---------- Vessel injection/spray may be excluded. ----------	
	Verify ~~each~~ the required ~~ECCS injection/spray~~LPCI or LPCS subsystem actuates on a ~~n actual or simulated automatic~~manual initiation signal or the required HPCS subsystem can be manually operated.	In accordance with the Surveillance Frequency Control Program

3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS), RPV WATER INVENTORY CONTROL, AND REACTOR CORE ISOLATION COOLING (RCIC) SYSTEM

3.5.1 ECCS - Operating

LCO 3.5.1 Each ECCS injection/spray subsystem and the Automatic Depressurization System (ADS) function of six safety/relief valves shall be OPERABLE.

APPLICABILITY: MODE 1,
MODES 2 and 3, except ADS valves are not required to be OPERABLE with reactor steam dome pressure ≤ 150 psig.

ACTIONS

----------NOTE----------
LCO 3.0.4.b is not applicable to HPCS.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One low pressure ECCS injection/spray subsystem inoperable.	A.1 Restore low pressure ECCS injection/spray subsystem to OPERABLE status.	7 days[(1)]
B High Pressure Core Spray (HPCS) System inoperable.	B.1 Verify by administrative means RCIC System is OPERABLE when RCIC System is required to be OPERABLE. AND B.2 Restore HPCS System to OPERABLE status.	Immediately 14 days

[(1)] The Completion Time that one train of RHR (RHR-A) can be inoperable as specified by Required Action A.1 may be extended beyond the 7 day completion time up to 7 days to support restoration of RHR-A following pump and motor replacement. This footnote will expire at 23:59 PST February 28, 2019.

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.5.2.8	----------NOTE---------- Vessel injection/spray may be excluded. ----------	
	Verify the required LPCI or LPCS subsystem actuates on a manual initiation signal or the required HPCS subsystem can be manually operated.	In accordance with the Surveillance Frequency Control Program

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.5.2.8

The required ECCS subsystem is required to have a manual start capability. This Surveillance verifies that a manual initiation signal will cause the required LPCI subsystem or LPCS System to start and operate as designed, including pump startup and actuation of all automatic valves to their required positions. The HPCS system is verified to start manually from a standby configuration, and includes the ability to override the RPV Level 8 injection valve isolation.

The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

This SR is modified by a Note that excludes vessel injection/spray during the Surveillance. Since all active components are testable and full flow can be demonstrated by recirculation through the test line, coolant injection into the RPV is not required during the Surveillance.

REFERENCES

1. Information Notice 84-81 "Inadvertent Reduction in Primary Coolant Inventory in Boiling Water Reactors During Shutdown and Startup," November 1984.FSAR, Section 6.3.3.4.
2. Information Notice 86-74, "Reduction of Reactor Coolant Inventory Because of Misalignment of RHR Valves," August 1986.10 CFR 50.36(c)(2)(ii).
3. Generic Letter 92-04, "Resolution of the Issues Related to Reactor Vessel Water Level Instrumentation in BWRs Pursuant to 10 CFR 50.54(f), " August 1992.E/I-02-91-1011.
4. NRC Bulletin 93-03, "Resolution of Issues Related to Reactor Vessel Water Level Instrumentation in BWRs," May 1993.E/I-02-98-1002.
5. Information Notice 94-52, "Inadvertent Containment Spray and Reactor Vessel Draindown at Millstone 1," July 1994.TM 2092.
6. General Electric Service Information Letter No. 388, "RHR Valve Misalignment During Shutdown Cooling Operation for BWR 3/4/5/6," February 1983.
7. E/I-02-91-1011.
8. E/I-02-98-1002.
9. TM 2092.