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10 CFR 50.54(f)

September 6, 2018  
GO2-18-085

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

Subject: **COLUMBIA GENERATING STATION, DOCKET NO. 50-397  
REQUEST FOR EXTENSION OF SEISMIC PROBABILISTIC RISK  
ASSESSMENT SUBMITTAL SCHEDULE**

References:

1. Letter from E. J. Leeds (NRC) to All Power Reactor Licensees and Holders of Construction Permits in Active or Deferred Status, "Request for Information Pursuant to Title 10 of the *Code of Federal Regulations* 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident," dated March 12, 2012 (ML12053A340)
2. Letter from F. Vega (NRC) to M. E. Reddemann (Energy Northwest), "Columbia Generating Station Staff Assessment of Information Provided under Title 10 of the *Code Of Federal Regulations* Part 50, Section 50.54(f), Seismic Hazard Reevaluations for Recommendation 2.1 of the Near-Term Task Force Review of Insights from the Fukushima Dai-Ichi Accident," dated November 04, 2016 (ML16285A410)
3. Letter from W. M. Dean (NRC) to Power Reactor Licensees, "Final Determination of Licensee Seismic Probabilistic Risk Assessments Under the Request for Information Pursuant to Title 10 of the *Code of Federal Regulations* 50.54(f) Regarding Recommendation 2.1 "Seismic" of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident," dated October 27, 2015 (ML15194A015)
4. Letter GO2-16-021 from A. L. Javorik (Energy Northwest) to the NRC, "Expedited Seismic Evaluation Process (ESEP) Report in Response to NRC Request for Information Pursuant to 10 CFR 50.54(f) Regarding Recommendation 2.1 of the Near-term Task Force Review of Insights from the Fukushima Dai-Ichi Accident," dated January 20, 2016 (ML16028A318)

5. Letter GO2-17-204 from A. L. Javorik (Energy Northwest) to the NRC, "Energy Northwest's Submittal of the Spent Fuel Pool Evaluation Supplemental Report, Response to NRC Request for Information Pursuant to 10 CFR 50.54(f) Regarding Recommendation 2.1 of the Near-Term Task Force Review of Insights from the Fukushima Dai-Ichi Accident," dated December 28, 2017 (ML18002A424)

Dear Sir or Madam:

By Reference 1, the Nuclear Regulatory Commission (NRC) requested licensees reevaluate the seismic hazard at their sites using present-day NRC requirements and guidance. As documented in Reference 2, the reevaluated seismic hazard for Columbia exceeds the plant design basis seismic hazard. By Reference 3, the NRC established a due date of March 31, 2019 for submittal of a Seismic Probabilistic Risk Assessment (SPRA). Reference 2 also required the submittal of a spent fuel pool evaluation. References 4 and 5 provided the Columbia expedited seismic evaluation process report and the spent fuel pool evaluation supplemental report, respectively.

By this letter, Energy Northwest is requesting an extension of the March 31, 2019 due date for submittal of a SPRA for the Columbia Generating Station (Columbia) Unit 2.

Originally, the SPRA work schedule was based on the assumption that only simplified structure seismic fragilities were anticipated since structures have typically not been significant risk contributors in the previous SPRAs. Preliminary risk quantifications for the current SPRA were performed in March 2018. Insights from this risk quantification indicated that seismic fragilities of plant structures are dominant risk contributors that drive the SPRA results. Therefore, detailed seismic fragilities of these structures using more advanced analytical methods are now required for realistic risk quantification. This unanticipated additional analysis will require additional time. This additional time will allow Energy Northwest to adequately address the facts and observations via the Independent Assessment Team process described in Nuclear Energy Institute (NEI) Letter, "Final Revision of Appendix X to NEI 05-04/07-12/12-16, Close-Out of Facts and Observations (F&Os)," dated February 21, 2017. Additionally, Energy Northwest plans to submit the Mitigating Strategies Assessment (MSA) for the reevaluated seismic hazards by September 30, 2019.

As a result, in order to complete the SPRA evaluation for Columbia an extension of 6 months is requested. Energy Northwest is requesting revised completion date of September 30, 2019.

With regards to precedent, the following is a list of who have also sought extensions.

Similar Submittal Date Change Requests				
Plant	Request Letter	Original Submittal Due Date	Approval Letter	Revised Submittal Due Date
Callaway	6/15/2017 ML17166A474	12/31/17	8/22/2017 ML17200D113	12/31/2018

Similar Submittal Date Change Requests				
Plant	Request Letter	Original Submittal Due Date	Approval Letter	Revised Submittal Due Date
DC Cook	11/15/2017 ML17321A083	6/30/2018	2/1/2018 ML18011A217	11/6/2019
Peach Bottom	3/15/2018 ML18074A303	3/31/2018	4/24/2018 ML180938511	9/28/2018
Diablo Canyon	9/6/2017 ML17249A431	11/30/2017	10/23/2017 ML17269A177	4/30/2018

If you should have any questions regarding this submittal, please contact Mr. R. M. Garcia, Licensing Supervisor, at 509-377-8463.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 6<sup>th</sup> day of Sept., 2018.

Respectfully,



A. L. Javorik  
Vice President, Engineering

cc: NRC Region IV Administrator      NRC NRR Project Manager  
NRC Sr. Resident Inspector - 988C      CD Sonoda - BPA/1399 (email)  
WA Horin - Winston & Strawn (email)