



J. K. Dittmer
Columbia Generating Station
P.O. Box 968, PE01
Richland, WA 99352-0968
Ph. 509.377. 4348 | F. 509.377.4150
jkdittmer@energy-northwest.com

April 15, 2020
GO2-20-063

10 CFR 50.90

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

Subject: **COLUMBIA GENERATING STATION, DOCKET NO. 50-397
EXIGENT LICENSE AMENDMENT REQUEST FOR EXTENSION OF
IMPLEMENTATION PERIOD FOR AMENDMENT 255 CHANGE TO
CONTROL ROOM AIR CONDITIONING SYSTEM**

Dear Sir or Madam:

Pursuant to 10 CFR 50.90 and 10 CFR 50.91(a)(6), Energy Northwest hereby requests exigent approval for a license amendment to extend the implementation period for License Amendment No. 255 to Renewed Facility Operating License No. NPF-21 for Columbia Generating Station (Columbia). License Amendment 255 was issued on February 6, 2020.

This License Amendment Request (LAR) is necessitated by governmental response in the State of Washington and nationwide to the Novel Coronavirus Disease (COVID-19) global pandemic. Washington State Governor Jay Inslee issued Proclamation 20-25.1 extending and amending Proclamations 20-05 and Stay Home – Stay Healthy 20-25, through May 4, 2020. As discussed with Nuclear Regulatory Commission (NRC) staff on April 2, 2020, an exigent LAR is needed to ensure continued compliance with the governmental proclamations and with operating license requirements. The request is purely administrative in nature, in that it will extend the implementation date of License Amendment 255 from May 6, 2020 to February 6, 2021. This extension date encompasses the weeks of the next two Control Room Chilled Water (CCH) system regularly scheduled work windows of December 21, 2020 and January 11, 2021, while allowing for latitude of the appropriate divisional weeks in January 2021 to ensure all the work is complete.

The proposed change has been evaluated in accordance with 10 CFR 50.91(a)(1) using criteria in 10 CFR 50.92(c) and it has been determined that this change involves no significant hazards considerations. The bases for these determinations are included in Enclosure 1 of this submittal.

No new commitments are being made by this request.

In accordance with 10 CFR 50.91, Energy Northwest is notifying the State of Washington of this amendment request by transmitting a copy of this letter and enclosures to the designated state official.

Energy Northwest requests approval of the proposed amendment by May 5, 2020, prior to the expiration of the existing implementation date of Amendment 255, on May 6, 2020.

If there are any questions or if additional information is needed, 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 this ^{4/15/2020} _____ day of April, 2020.

Respectfully,

DocuSigned by:

60D4E7CA44C64D4...

J. K. Dittmer
Vice President, Engineering

Enclosures: As stated

cc: NRC RIV Regional Administrator
NRC NRR Project Manager
NRC Senior Resident Inspector/988C
NRC NRR Division of Policy and Rulemaking (DPR) Director (e-mail)
NRC NRR Plant Licensing Branch Chief (BC) (e-mail)
CD Sonoda – BPA/1399 (email)
EFSECutc.wa.gov – EFSEC (email)
E Fordham, Deputy Director, Radiation Protection - WDOH
R Brice, WDOH
L Albin, WDOH

Evaluation of Proposed Change

1.0 SUMMARY DESCRIPTION

This evaluation supports an exigent license amendment request (LAR) to extend the implementation period for License Amendment 255, for a Licensing Basis Change to Control Room Air Conditioning System, (Reference 1) to ensure compliance with current governmental mandates and Renewed Facility Operating License No. NFP-22 for Columbia Generating Station (Columbia).

By letter dated February 6, 2020, the Nuclear Regulatory Commission (NRC) issued License Amendment 255 (Reference 1). The amendment was requested by Energy Northwest's letter to the NRC dated February 25, 2019 (Reference 2). Amendment 255 allows use of the Control Room Chilled Water (CCH) system or the Standby Service Water (SW) system as acceptable cooling sources in support of the Control Room Air Conditioning (AC) system. This allows for the safety related function of maintaining the Main Control Room (MCR) less than or equal to the 104°F equipment qualification temperature limit during and following design basis events (DBEs), and maintaining the long term, steady state MCR design condition temperature less than or equal to 85°F that supports 30 days continuous MCR occupancy. The change provides maximum flexibility with regard to allowable Control Room AC system cooling sources, which addresses SW capability limitations (Reference 1).

The amendment was effective the date of issuance and is required to be implemented by May 6, 2020.

On February 29, 2020, Washington Governor Jay Inslee issued a proclamation declaring a state of emergency in Washington (Reference 3). On March 13, 2020, President Trump declared the Novel Coronavirus Disease (COVID-19) pandemic a national emergency (Reference 4).

As part of the ongoing response to the pandemic, Energy Northwest has only employees designated as essential physically reporting to the site and the only work being performed at this time are activities that must be done to continue the safe operation of the plant. The implementation of Amendment 255 is not currently needed to support safe operation of Columbia. Therefore, Energy Northwest seeks an extension for implementation of Amendment 255 to February 6, 2021. This extension date encompasses the weeks of the next two CCH system regularly scheduled work windows of December 21, 2020 and January 11, 2021, while allowing for latitude of the appropriate divisional weeks in January 2021 to ensure all the work is complete.

Exigent Circumstances:

The Commission's regulations, 10 CFR 50.91, contain provisions for issuance of amendments when the usual 30-day public notice period cannot be met. One type of

special exception is an exigency. An exigency is a case where the staff and licensee need to act promptly. In this case, Energy Northwest cannot implement an amendment within the implementation date agreed upon, and therefore a new date must be agreed upon to. Pursuant to 10 CFR 50.91 (a)(6), Energy Northwest is requesting the proposed amendment on an exigent basis.

2.0 DETAILED DESCRIPTION

On February 29, 2020, Washington Governor Jay Inslee issued Proclamation 20-05, in relation to COVID-19 outbreak in Washington proclaiming:

. . . that a State of Emergency exists in all counties in the state of Washington, and direct the plans and procedures of the Washington State Comprehensive Emergency Management Plan be implemented. State agencies and departments are directed to utilize state resources and to do everything reasonably possible to assist affected political subdivisions in an effort to respond to and recover from the outbreak (Reference 3).

Energy Northwest is a not-for-profit, joint operating agency and municipal corporation of Washington State. It owns and operates several energy producing projects, included, but not limited to, Columbia Generating Station.

On March 13, 2020, President Trump declared the COVID-19 pandemic a national emergency (Reference 4).

On March 23, 2020, Washington's Governor Inslee issued Proclamation 20-25, Stay Home – Stay Healthy (Reference 5). It mandated in part:

All people in Washington State shall immediately cease leaving their home or place of residence except: (1) to conduct or participate in *essential* activities, and/or (2) for employment in *essential* business services. This prohibition shall remain in effect until midnight on April 6, 2020, unless extended beyond that date (Reference 5). [Emphasis added]

In discussing essential business services, the Proclamation (Reference 5) stated:

For purposes of this Proclamation, minimum basic operations are the minimum activities necessary to maintain the value of the business' inventory, *preserve the condition of the business' physical plant and* equipment, ensure security, process payroll and employee benefits, facilitate employees of the business being able to continue to work remotely from their residences, and related functions... [Emphasis added]

In support of the proclamation, the Governor designated Essential Critical Infrastructure Workers (Reference 6) as workers "ensuring continuity of functions critical to public health and safety, as well as economic and national security." The essential workforce

in the energy sector included, but was not limited to, “Workers needed for safe and secure operations at nuclear generation.”

Energy Northwest moved to meet these government mandates by maintaining operation of Columbia as essential infrastructure and protecting its essential employees. Beginning on March 24, 2020, Energy Northwest required all non-essential employees to work remotely. Effective March 23, 2020, Columbia’s work control temporarily modified the existing schedule grade coding to a graded approach of A, B and C to identify various categories of work. Columbia is only performing A work during this time. These are “must do” activities required to maintain the safe operation of Columbia and help determine the minimum staffing requirements needed from the various organizations who operate and maintain the plant.

On April 2, 2020, Washington’s Governor Inslee, issued Proclamation 20-25.1 Extending Stay Home – Stay Healthy (Reference 7) through May 4, 2020. On April 6, 2020, Energy Northwest announced that it would continue to have only personnel essential to the safe operation of Columbia onsite, with approximately 500 employees currently designated non-essential continuing to work remotely.

3.0 TECHNICAL EVALUATION

From receipt of the issued amendment on February 6, 2020, through Thursday April 2, 2020, Columbia was moving forward with implementation of Amendment 255. However, as noted above, shortly after the amendment was issued the situation surrounding the COVID-19 pandemic began to change rapidly, especially in Washington State.

With the issuance of Proclamation 20-25 (Reference 4), Energy Northwest reduced onsite staffing at Columbia to those employees who are required to maintain the plant in a safe, stable operating condition.

As noted above, Work Control at Columbia implemented temporary changes in the work management process in order to maintain focus on the health and safety of employees as well as continue safe operation of the plant. Grade A tasks are considered “must do” activities and will help determine the minimum staffing requirements needed from the various organizations who operate and maintain the plant. Grade B tasks are considered “should do” and are work activities the station should perform if resource availability from the various organizations who operate and maintain the plant can support them with the essential resources available. Grade C tasks are considered all other work.

Implementation of Amendment 255, requires plant manipulation, part replacement and testing actions. While all of these actions are scheduled, they are coded as “schedule as resources allow.”

Additionally, there are 22 level 1 procedures and 4 licensing basis changes associated with this change. The processing of these changes would require individuals who are currently considered non-essential to be onsite and interacting with Control Room personnel and other personnel who are currently designated essential to the safe and secure operation of the plant.

Operation of Columbia with delayed implementation of Amendment 255 will have no impact on nuclear safety since the existing alignment of the Control Room Air Condition System is adequate to perform its design function. Amendment 255 provides an extra layer of safety in the event of a design basis event (DBE). The change provides maximum flexibility with regard to allowable control room AC system cooling sources, while also addressing the SW capability limitations. The Amendment is not tied to implementation of any specific station heat load addition modification (Reference 1).

4.0 REGULATORY EVALUATION

4.1 Applicable Regulatory Requirements

The proposed change has been evaluated to determine whether applicable regulations and requirements continue to be met. Energy Northwest has determined that the proposed change does not require any exemptions or relief from regulatory requirements other than the license. The following applicable regulations and regulatory requirements were reviewed in making this determination: 10 CFR 50.90, 10 CFR 50.91, and 10 CFR 50.92. The existing plant design continues to comply with all regulatory requirements.

4.2 Precedent

Two similarly related license amendments involving extensions to license amendment implementation due dates were approved and are summarized below:

1. Limerick Generating Station, Unit 2 - Issuance of Exigent Amendment Re: Implementation Period for Amendment No. 174 - Leak Detection System Setpoint and Allowable Value Changes (TAC NO. MF5695) dated February 25, 2015. The license amendment extended the implementation date for changes to instrument setpoints and allowable values associated with the leak detection system due to unforeseen difficulties associated with calibration of a temperature indicating switch. The NRC staff found that the proposed extension of the implementation period was purely administrative in nature and that operation of the plant with the currently calibrated setpoints (i.e., setpoints prior to approval of Amendment No. 174) did not raise any safety concerns and was acceptable. (ML 15049A084)
2. Columbia Generating Station – Issuance of Amendment Re: Extension of Implementation Period for Amendment No. 232 Changing Technical Specification Table 3.3.1.1-1 function 7, "Scram Discharge Volume Water Level- High" (Exigent Circumstances) (TAC NO. MF6234) dated June 11, 2015. The license

amendment extended the implementation date from prior to restarting from refueling outage R-22 to prior to restarting from refueling outage R-23 due to unforeseen circumstances associated with qualification of AMETEK trip units. The NRC staff determined that the proposed amendment neither involved any physical changes to the plant nor any changes in the operation of the plant.

5.0 SIGNIFICANT HAZARDS CONSIDERATION

Energy Northwest has evaluated whether or not a significant hazards consideration is involved with the proposed amendment by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

1) Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The proposed amendment to implement a schedule extension is administrative in nature and does not require any physical plant modifications, physically affect any plant systems or components, or entail changes in plant operation. The amendment implementation schedule extension does not increase the probability or consequences of an accident previously evaluated in the Final Safety Analysis Report. The change in the implementation schedule of the Control Room Air Condition System License Amendment Request (LAR) will have no impact on the initiation or the consequences of any accidents previously evaluated. Technical Specification requirements that govern operability or routine testing of plant instruments are not assumed to be initiators of any analyzed event.

The change in implementation schedule will not increase the consequences of an accident since the existing plant configuration is in accordance with the plant's design and licensing bases. All acceptance criteria continue to be met. Given the Novel Coronavirus Disease (COVID-19) pandemic precautions in place in Washington State, delay of implementation is the no risk option. Therefore, there is no significant increase in the probability or consequences of an accident previously evaluated.

2) Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously analyzed?

Response: No.

There are no postulated hazards, new or different, contained in this amendment. The proposed amendment to the implementation schedule extension is administrative in nature and does not require any physical plant modifications, physically affect any plant systems or components, or entail changes in plant operation. Given the COVID-19 pandemic precautions in place in Washington

State, delay of implementation is the no risk option. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3) Does the proposed amendment involve a significant reduction in a margin of safety?

Response: No.

The proposed amendment to the implementation schedule extension is administrative in nature and does not require any physical plant modifications, physically affect any plant systems or components, or entail changes in plant operation. The existing plant configuration maintains the required redundancy, diversity and capability to ensure plant design and licensing basis are met. Given the COVID-19 pandemic precautions in place in Washington State, delay of implementation is the no risk option. Therefore, the proposed change does not involve a significant reduction in the margin of safety.

Based on the above, Energy Northwest concludes that the proposed amendment does not involve a significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

6.0 CONCLUSION

Based on the considerations discussed above: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the applicable regulations as identified herein, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

7.0 ENVIRONMENTAL CONSIDERATION

Energy Northwest has determined that the proposed amendment would change requirements with respect to installation or use of a facility component located within Columbia's restricted area, as defined in 10 CFR 20, or would change an inspection or surveillance requirement. Energy Northwest has evaluated the proposed change and has determined that the change does not involve, (i) a significant hazards consideration, (ii) a significant change in the types or a significant increase in the amounts of any effluents that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed change meets the eligibility criteria for categorical exclusion in accordance with 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

8.0 REFERENCES

1. Columbia Generating Station – Issuance of Amendment NO. 255 RE: Control Room Air Conditioning System (EPID L-2019-LLA-0034) dated February 6, 2020 (ML19337C368)
2. AL Javorik., Energy Northwest, letter to NRC, “Columbia Generating Station, Docket No. 50-397, License Amendment Request for Licensing Basis Change to Control Room Air Conditioning System, dated February 25, 2019 (ML19057A549).
3. Governor Jay Inslee, Proclamation 20-05, dated February 29, 2020, <https://www.governor.wa.gov/office-governor/official-actions/proclamations> (accessed 4/6/2020)
4. President Donald J. Trump, Proclamation on Declaring a National Emergency Concerning the Novel Coronavirus Disease (COVID-19) Outbreak, dated March 13, 2020, <https://www.whitehouse.gov/presidential-actions/proclamation-declaring-national-emergency-concerning-novel-coronavirus-disease-covid-19-outbreak/> (accessed 4/8/2020)
5. Governor Jay Inslee, Proclamation 20-25 Stay Home – Stay Healthy, dated March 23, 2020, <https://www.governor.wa.gov/office-governor/official-actions/proclamation> (accessed 4/6/2020)
6. Governor Jay Inslee, Appendix to Proclamation 20-25 Stay Home – Stay Healthy, dated March 23, 2020, [https://www.governor.wa.gov/sites/default/files/WA%20Essential%20Critical%20Infrastructure%20Workers%20\(Final\).pdf](https://www.governor.wa.gov/sites/default/files/WA%20Essential%20Critical%20Infrastructure%20Workers%20(Final).pdf) (accessed 4/6/2020)
7. Governor Jay Inslee, Proclamation 20-25.1 Extension of Proclamation 20-05 20-25 Stay Home – Stay Healthy, dated April 2, 2020, <https://www.governor.wa.gov/office-governor/official-actions/proclamations> (accessed 4/6/2020)