



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

August 21, 2020

Mr. Bradley J. Sawatzke
Chief Executive Officer
Energy Northwest
Mail Drop 1023
76 North Power Plant Loop
P.O. Box 968 (Mail Drop 1023)
Richland, WA 99352-0968

SUBJECT: COLUMBIA GENERATING STATION - PUBLIC NOTICE OF APPLICATION
FOR AMENDMENT TO RENEWED FACILITY OPERATING LICENSE
(EPID L-2020-LLA-0181)

Dear Mr. Sawatzke:

The enclosed announcement was forwarded to the *Tri-City Herald*, Kennewick, Washington, for publication. This announcement relates to Energy Northwest's application dated August 20, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20233A976), for an amendment to Renewed Facility Operating License No. NPF-21 for Columbia Generating Station (Columbia).

The proposed amendment would revise Columbia Technical Specification (TS) 3.8.7, "Distribution Systems – Operating," ACTION 3.8.7.A Completion Time, on a one-time basis, from 8 hours to 16 hours.

Energy Northwest requested approval of the proposed amendment on an exigent basis, pursuant to Title 10 of the *Code of Federal Regulations* Section 50.91(a)(6), by September 3, 2020. This proposed amendment is necessary to support the repair of a degraded transformer that feeds Division 2 of the electrical distribution buses. The transformer replacement and post-maintenance testing would exceed the current TS Condition 3.8.7.A, thereby requiring a unit shutdown. It is unpredictable to when the output voltage of the transformer would fall below the minimum allowable voltage.

B. Sawatzke

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If you have any questions, please contact Samson Lee at 301-415-3168 or by e-mail at Samson.Lee@nrc.gov.

Sincerely,

/RA Samson Lee for/

Mahesh C. Chawla
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-397

Enclosure:
Public Notice

cc: Listserv

ENCLOSURE
PUBLIC NOTICE

PUBLIC NOTICE

THE U.S. NUCLEAR REGULATORY COMMISSION PROPOSES TO AMEND THE RENEWED FACILITY OPERATING LICENSE FOR THE COLUMBIA GENERATING STATION

The U.S. Nuclear Regulatory Commission (NRC, the Commission) has received an application dated August 20, 2020 (available at Agencywide Documents Access and Management System (ADAMS) Accession No. ML20233A976), from Energy Northwest, for an exigent amendment to the renewed facility operating license for the Columbia Generating Station (Columbia), located in Richland, Washington. The licensee requests NRC approval by September 3, 2020.

The proposed exigent amendment would change Technical Specification (TS) 3.8.7, "Distribution Systems – Operating." This TS change would add a one-time extension of the Completion Time (CT) of TS Condition 3.8.7.A specifically associated with Division 2 alternating current (AC) electrical power distribution inoperability caused by inoperability of 120/240-volt power panel E-PP-8AE during replacement of its supply transformer E-TR-8A/1. The CT would be changed on a one-time basis from 8 hours to 16 hours to support replacement of transformer.

The licensee requested that the proposed amendment be processed on an exigent basis in accordance with the provisions in Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.91(a)(6). Under 10 CFR 50.91(a)(6)(i), where the Commission finds that exigent circumstances exist, in that a licensee and the Commission must act quickly and that time does not permit the Commission to publish a *Federal Register* notice allowing 30 days for prior public comment, and it also determines that the amendment involves no significant hazards considerations, the Commission will either (A) issue a *Federal Register* notice providing notice of an opportunity for hearing and allowing at least 2 weeks from the date of the notice for prior

public comment or (B) use local media to provide reasonable notice to the public in the area surrounding a licensee's facility of the licensee's amendment and of its proposed determination that no significant hazards consideration is involved, consulting with the licensee on the proposed media release and on the geographical area of its coverage. Due to the timing of the proposed amendment, the NRC is providing this notice in local media pursuant to 10 CFR 50.91(a)(6)(i)(B) and has consulted with the licensee and the NRC regional office on the proposed media release.

The licensee's claim of exigent circumstances is based on the considerations below. On August 6, 2020, a reduced voltage trend was identified on the supply transformer to a required AC electrical distribution panel. The licensee's internal operating experience associated with a failure of this type of transformer in 2007 has shown that lightly loaded transformers of this type are susceptible to accelerated degradation. It is unpredictable as to when the output voltage of the transformer would fall below the minimum allowable voltage. The licensee determined through its previous replacement history and experience that 8 hours is an insufficient period for a replacement of this type of transformer. The transformer replacement and post-maintenance testing would exceed the current TS Condition 3.8.7.A, thereby requiring a unit shutdown. Additionally, this one-time change in CT would allow replacement and subsequent testing of the plant's transformer at the earliest scheduled opportunity.

Based on this information, the NRC staff finds that exigent circumstances exist in that the licensee and the NRC must act quickly and that time does not permit the NRC staff to publish a *Federal Register* notice allowing 30 days for prior public comment.

As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration using the standards in 10 CFR 50.92. Under the NRC's regulations in 10 CFR 50.92(c), this means that operation of the facility in accordance with the proposed amendment would not (1) involve a significant increase in the probability or

consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety. The licensee and the NRC staff have evaluated the proposed change with regard to the determination of whether or not a significant hazards consideration is involved as described below.

Operation of Columbia in accordance with the proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed amendment does not increase the probability of an accident because the onsite Class 1E AC electrical power distribution cannot initiate an accident. The onsite Class 1E AC electrical power distribution system ensures the availability of AC electrical power for the systems required to shut down the reactor and maintain it in a safe condition after an anticipated operational occurrence or a postulated design basis accident. The proposed one time 16-hour CT extension does not alter the conditions, operating configurations, or minimum amount of operating equipment assumed in the safety analysis for accident mitigation. De-energizing power panel E-PP-8AE does not affect Division 1 equipment that would be relied upon during any accident response. No changes are proposed in the manner in which the electrical power distribution provides plant protection or which create new modes of plant operation. In addition, the deterministic assessment and the probabilistic risk assessment evaluation concluded that there is no increased risk contribution for the increased CT. The proposed change in CT does not affect the probability of any event initiators. There will be no degradation in the performance of, or an increase in the number of challenges imposed on, safety related equipment assumed to function during an accident situation. There will be no change to normal plant operating parameters or accident mitigation performance. Therefore, there is no significant increase in the probability or consequences of an accident previously evaluated.

The proposed amendment will not create the possibility of a new or different kind of accident from any previously evaluated because inoperability of Division 2 AC electrical power

distribution is not an accident precursor. There are no hardware changes nor are there any changes in the method by which any plant system performs a safety function. This request does not affect the normal method of plant operation. The proposed amendment does not introduce new equipment, or new way of operation of the system which could create a new or different kind of accident. No new external threats, release pathways, or equipment failure modes are created. No new accident scenarios, transient precursors, failure mechanisms, or limiting single failures are introduced as a result of this request. Therefore, the implementation of the proposed amendment will not create a possibility for an accident of a new or different type than those previously evaluated.

The proposed amendment will not involve a significant reduction in a margin of safety. Columbia's AC and direct current electrical power distribution subsystems are designed with sufficient redundancy such that a one division may be removed from service for maintenance or testing and the remaining subsystems are capable of providing electrical loads to satisfy the Final Safety Analysis Report requirements for accident mitigation or plant shutdown. The deterministic evaluation supports that no addition risk is presumed from the CT extension. The probabilistic safety assessment evaluation concluded that the risk contribution of the CT extension is within allowable limits. There will be no change to the manner in which safety limits or limiting safety system settings are determined nor will there be any change to those plant systems necessary to assure the accomplishment of protection functions. Therefore, the proposed change does not involve a significant reduction in the margin of safety.

Following an initial review of this application, the requested amendment has been evaluated against the standards in 10 CFR 50.92 and the NRC has made a proposed determination that the requested amendment involves no significant hazards considerations. The proposed change would not significantly increase the probability or consequences of any accident previously considered, nor create the possibility of a new or different kind of accident, nor significantly decrease any margin of safety.

The NRC is seeking public comments on this proposed determination that the amendment involves no significant hazards considerations. The NRC will consider comments received through August 31, 2020. If the proposed determination that the requested amendment involves no significant hazards consideration becomes final, the NRC will issue the amendment without first offering an opportunity for a public hearing. An opportunity for a hearing will be published in the *Federal Register* at a later date and any hearing request will not delay the effective date of the amendment.

The NRC may issue the amendment prior to the expiration of the comment period, should circumstances change such that failure to act in a timely way would result, for example, in derating or shutdown of the facility. Should the NRC take action prior to the expiration of the comment period, it will publish in the *Federal Register* a notice of issuance. Before any issuance of the proposed amendment, the NRC will need to make the findings required by the Atomic Energy Act of 1954, as amended, and NRC regulations.

If the NRC decides in its final determination that the amendment does involve a significant hazards consideration, a notice of opportunity for a prior hearing will be published in the *Federal Register* and, if a hearing is granted, it will be held before the amendment is issued.

Comments on the proposed determination of no significant hazards consideration may be (1) telephoned to Jennifer Dixon-Herrity, Chief, Plant Licensing Branch 4, by collect call to 301-415-2967, (2) e-mailed to Jennifer.Dixon-Herrity@nrc.gov, or (3) submitted in writing to Office of Administration, Mail Stop: TWFN-7-A60M, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, ATTN: Program Management, Announcements and Editing Staff. All comments received by 5:00 pm Eastern Daylight Time on August 31, 2020, will be considered in reaching a final determination.

A copy of the application may be examined electronically through the NRC's ADAMS in the NRC Library at <http://www.nrc.gov/reading-rm/adams.html> under Accession No. ML20233A976. Persons who do not have access to ADAMS or who encounter problems in

accessing the documents located in ADAMS should contact the NRC Public Document Room (PDR) Reference staff by telephone at 1-800-397-4209, or 301-415-4737, or by e-mail to pdr.resource@nrc.gov.

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ADAMS Accession Nos.:

Letter: ML20232A304

Public Notice: ML20232A308

***via e-mail**

OFFICE	NRR/DORL/LPL4/PM	NRR/DORL/LPL4/LA*	OGC – NLO*
NAME	SLee	PBlechman	AGhosh Naber
DATE	8/18/2020	8/21/2020	8/21/2020
OFFICE	NRR/DORL/LPL4/BC*	NRR/DORL/LPL4/PM*	
NAME	JDixon-Herrity	MChawla (SLee for)	
DATE	8/21/2020	8/21/2020	

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