

From: Chawla, Mahesh
Sent: Wednesday, July 28, 2021 1:10 PM
To: Garcia, Richard M.
Cc: Dixon-Herrity, Jennifer; Wu, Angela; Gibson, Lauren; Josey, Jeffrey; Niebaum, Phil; Donley, Amber; Freeman, Harry; Pick, Greg
Subject: Final - Request for Additional Information - Columbia Generating Station - License Amendment Request to Remove License Condition 2.C.(34) and Revise License Condition 2.C.(35) - EPID L-2021-LLA-0074
Attachments: Columbia RAI 6-28-2021_Draft.docx

Dear Mr. Garcia,

By letter dated April 28, 2021 (Agencywide Documents and Access Management System (ADAMS) Accession No. ML21118A812), Energy Northwest (the licensee) requested a license amendment for Columbia Generating Station to remove license condition 2.C.(34) and revise license condition 2.C.(35). To complete its review, the NRC staff requested additional information (RAI) which was sent to you as a draft on July 12, 2021. We greatly appreciate the discussion we had during our clarification teleconference held today with your staff to discuss this request. As a result of this discussion, there were no changes made to the draft RAI. Therefore, attached here is the same RAI as the final version. You have agreed to provide your response within 30 days of the receipt of this email. Looking forward to your supplemental response and thanking you,

Sincerely,

Mahesh Chawla, Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
ph: 301-415-8371
Docket No. 50-397

C	DORL/LPL4/PM	DORL/LPL4/BC
M	MChawla	JDixon-Herrity
I	7/28/21	7/28/21

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REQUEST FOR ADDITIONAL INFORMATION
LICENSE AMENDMENT REQUEST TO REMOVE
LICENSE CONDITION 2.C.(34) AND REVISE
LICENSE CONDITION 2.C.(35)
ENERGY NORTHWEST
COLUMBIA GENERATING STATION
DOCKET NO. 50-397
EPID: L-2021-LLA-0074

By letter dated April 28, 2021 (Agencywide Documents and Access Management System (ADAMS) Accession No. ML21118A812), Energy Northwest (the licensee) requested a license amendment for Columbia Generating Station to remove license condition 2.C.(34) and revise license condition 2.C.(35). To complete its review, the NRC staff requests additional information as follows.

NLRP-RAI-1

Issue

The proposed license condition 2.C.(35) as provided in the LAR reads:

The licensee's FSAR supplement submitted pursuant to 10 CFR 54.21(d) and Appendix A of NUREG-2123, as revised pursuant to the criteria set forth in 10 CFR 50.59, during the license renewal application review process, and as supplemented by Commitment Nos. 1, 5, 13, 14, 17, 18, 23, 24, 26, 27, 28, 32, 36, 38, 40, 41, 42, 43, 48, 49, 50, 53, 55, 58, 59, 60, 61, 63, 64, 65, 66, 67, 68, 69, and 70 of Appendix A of NUREG-2123, describes certain future programs and activities to be completed before the period of extended operation. Energy Northwest shall complete these activities no later than June/July 20, 2023, and shall notify the NRC in writing when implementation of these activities is complete.

With the proposed removal of condition 2.C.(34), it will no longer be clear that the FSAR supplement and table of commitments from Appendix A of NUREG-2123 (the SER) are now included in the FSAR itself, which may be revised pursuant to 10 CFR 50.59. The proposed wording in the license amendment request for revised license condition 2.C.(35) indicates that the FSAR supplement itself (as a standalone document) and the table of commitments in Appendix A of NUREG-2123 (the SER) may be revised pursuant to the criteria in 10 CFR 50.59. The regulations at 10 CFR 50.59 specifically govern changes to the facility's FSAR, not to an FSAR supplement (except as it is incorporated into the FSAR) and not to a table in an SER. Revising these documents pursuant to the criteria in 10 CFR 50.59 does not place these documents within the regulatory framework. The proposed license condition makes no mention of the FSAR, which is the document to be managed by the 10 CFR 50.59 process.

Additionally, the proposed license condition would place all of the commitments as listed in NUREG-2123 into the FSAR, including commitment numbers 55, 56, 57, and 71, when it is the intent of the LAR to exclude these commitments. It is not clear to the staff whether the March 4, 2020 FSAR update added the entire table of commitments, including these four, to the FSAR and the licensee subsequently removed them following a 10 CFR 50.59 review, or whether the license condition should be revised to explicitly exclude these four commitments.

Request

(1) Please clarify whether the intent was for license condition 2.C.(35) to convey that the FSAR supplement and Appendix A of NUREG-2123, as standalone documents, would be revised according to 10 CFR 50.59 or whether the revisions would be made to the FSAR, which has been updated with the FSAR supplement and table of commitments from NUREG-2123. Please revise the license condition accordingly if necessary.

(2) If the intent is to include all commitments from Appendix A of NUREG-2123 *except* for commitment numbers 55, 56, 57, and 71, please revise the wording of the proposed license condition to reflect this. Alternately, if these four commitments were originally included in the table and then removed after a 10 CFR 50.59 review (as allowed by the current wording of the license condition), confirm this was the case.