

From: Chawla, Mahesh
Sent: Tuesday, August 3, 2021 5:39 PM
To: Garcia, Richard M.
Cc: Dixon-Herrity, Jennifer; Grover, Ravi; Hamm, Matthew; Jordan, Natreon; Niebaum, Phil; Josey, Jeffrey; Donley, Amber
Subject: Final - Request for Additional Information - Columbia Generating Station - License Amendment Request to Adopt TSTF-439, "Eliminate Second Completion Times Limiting Time from Discovery of Failure to Meet an LCO" - EPID L-2021-LLA-0259
Attachments: Columbia- RAI regarding application to adopt TSTF-439 changes.docx

Dear Mr. Garcia,

By application dated December 2, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession Number ML20337A141), Energy Northwest (the licensee), submitted a license amendment request for Columbia Generating Station (Columbia) to adopt Technical Specifications Task Force Traveler (TSTF) 439, Revision 2, "Eliminate Second Completion Times Limiting Time from Discovery of Failure to Meet an LCO [limiting conditions for operation]." The change would revise Section 1.3 of the Columbia Technical Specifications (TSs) to alter the discussion contained in Example 1.3-3 to eliminate second completion times (CT) as well as delete the second completion times associated with TS 3.8.1, "AC [alternating current] Sources – Operating," required actions A.3 and B.4.1, B.4.2.2 and TS 3.8.7, "Distribution Systems – Operating," required actions A.1 and B.1.

The NRC staff has reviewed the requested license amendment and determined that additional information (attached herewith) is required to complete the review. During the clarification with the NRC staff today, we discussed the requested information. Since there were no changes made to the draft RAI submitted to you on 7/26/21, the RAI is being sent to you as the final version. During the call, you agreed to provide a written response on the docket within 30 days. 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

DORL/LPL4/PM	DORL/LPL4/BC
MChawla	JDixon-Herrity
7/26/21	7/26/21

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Options

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REQUEST FOR ADDITIONAL INFORMATION
REGARDING LICENSE AMENDMENT REQUEST TO REVISE
TECHNICAL SPECIFICATIONS FOR COLUMBIA GENERATING STATION

DOCKET NO. 50-397

By letter dated December 2, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20337A141), Energy Northwest (the licensee) submitted a license amendment request for Columbia Generating Station (Columbia) to adopt Technical Specifications Task Force Traveler (TSTF) 439, Revision 2, "Eliminate Second Completion Times Limiting Time from Discovery of Failure to Meet an LCO [limiting conditions for operation]." The proposed change would revise Section 1.3 of the Columbia Technical Specifications (TSs) to alter the discussion contained in Example 1.3-3 to eliminate second completion times (CT) as well as delete the second completion times associated with TS 3.8.1, "AC [alternating current] Sources – Operating," required actions A.3 and B.4.1, B.4.2.2 and TS 3.8.7, "Distribution Systems – Operating," required actions A.1 and B.1.

The NRC staff has reviewed the requested license amendment and determined that additional information is required to complete the review.

Regulatory Requirements:

Part 50.36, "Technical Specifications," of Title 10 of the *Code of Federal Regulations* requires, in part, that the operating license of a nuclear production facility include TS. Paragraph 50.36(c)(2) of Title 10 of the *Code of Federal Regulations* requires, in part, that the TS include limiting conditions for operation (LCOs), which are the lowest functional capability or performance levels of equipment required for safe operation of the facility. When an LCO of a nuclear reactor is not met, the licensee shall shut down the reactor or follow any remedial action permitted by the TS, until the condition can be met.

Background:

Section 2.2 of the Columbia's application lists variations from the TS changes described in TSTF-439. The Staff is requesting additional information on two specific variations as discussed below:

- Regarding the first variation which concerns TS LCO 3.8.1, "AC Sources–Operating," Required Action A.3, the LAR's page 2 states:

"TS 3.8.1, Required Action A.3 contains two second CT that will be removed. The first is "6 days from discovery of failure to meet LCO when not associated with Required Action B.4.2.2" and "17 days from discovery of failure to meet LCO." This plant-specific change is the result of license amendment 197 issued on April 14, 2006 - Extension of Diesel Generator Completion Time (ADAMS Accession No. ML061000672).

The LAR justifies the proposed change as follows:

“The justification for removal of the Required Action B.4 second CT in TSTF-439 remains the same for the plant-specific completion times. Therefore, this change does not impact the applicability of TSTF-439.”

- Regarding the second variation which concerns TS LCO 3.8.1, “AC Sources – Operating,” Required Action B.4.2.2, the LAR’s page 3 states:

“TS 3.8.1, Condition B, contains two Required Actions to Restore required DG to OPERABLE status instead of one. Required Actions B.4.1 and B.4.2.2, Restore required DG to OPERABLE status are separated by the Logical Connector “OR” and each have a second CT. Required Action B.4.1 Restore required DG to OPERABLE status second Completion Time of 6 days from discovery of failure to meet LCO is being removed. Required Action B.4.2.2 Restore required DG to OPERABLE status second Completion Time of 17 days instead of 6 days from discovery of failure to meet LCO is also being removed. This plant-specific change is the result of license amendment 197 issued on April 14, 2006, Extension of Diesel Generator Completion Time.

The LAR justifies the proposed change as follows:

“The justification for removal of the Required Action B.4 second CT in TSTF-439 remains the same for the plant-specific completion times. Therefore, this change does not impact the applicability of TSTF-439.”

The above variations refer to the Staff’s approved license amendment 197 issued on April 14, 2006, “Extension of Diesel Generator Completion Time,” (ADAMS Accession No. ML0610006720, shown in bolded text). The staff’s approval for amendment 197 was based on the licensee’s Deterministic Evaluation, Risk Evaluation, PRA Capability and Insights, and several regulatory commitments as specified the Staff’s technical evaluation on pages 8, 13, 14 and 25 of the approved amendment.

RAI STSB-1

Please confirm that the proposed deletion of specific second completion times for TS 3.8.1 Required Actions mentioned above, does not adversely affect any operational restrictions or requirements imposed on plant operation by Amendment 197. If they are affected, please provide an evaluation and justification. The licensee’s proposed amendment does not address such evaluation for the specified variations.

RAI STSB-2

The licensee proposes to delete the Second CT associated with TS LCO 3.8.7 “Distribution Systems – Operating”, Required Action A.1 and Required Action B.1 (TS pages 3.8.7-2 and 3.8.7-3) which currently states, “AND 16 hours from discovery of failure to meet LCO 3.8.7.a or b.” This particular CT appears to apply when LCO 3.8.7 a or b is not met, and the version of the Distribution Systems TS on which TSTF-439’s changes are based does not contain an LCO structure divided into subparts in the manner of the LCO for Columbia TS 3.8.7. Please explain the variation and justify the applicability of TSTF-439 for the proposed deletion.