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August 20, 2021

GO2-21-108

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
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION
RELATED TO LICENSE AMENDMENT REQUEST TO ADOPT TSTF-
439, "ELIMINATE SECOND COMPLETION TIMES LIMITING TIME
FROM DISCOVERY OF FAILURE TO MEET AN LCO"**

- References:
1. Letter from R.E. Schuetz, Energy Northwest, to NRC, "License Amendment Request to Adopt TSTF-438, "Eliminate Second Completion Times Limiting Time from Discovery of Failure to Meet an LCO,"" Dated December 2, 2020 (ADAMS Accession Number ML20337A141)
 2. Email from M. Chawla, NRC to Richard M. Garcia, "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," dated August 3, 2021

Dear Sir or Madam:

By Reference 1 Energy Northwest 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]." By Reference 2 the Nuclear Regulatory Commission requested additional information related to the Energy Northwest submittal. The enclosure to this letter contains the requested information.

The No Significant Hazards Consideration Determination provided in the original submittal is not altered by this submittal. No new commitments are being made by this letter or the enclosure. If there are any questions or if additional information is needed, please contact Mr. R.M. Garcia, Licensing Supervisor, at 509-377-8463.

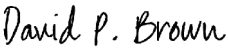
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I declare under penalty of perjury that the foregoing is true and correct.

Executed this 20th day of August 2021.

Respectfully,

DocuSigned by:

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David P Brown
Site Vice President

Enclosure: As stated

cc: NRC RIV Regional Administrator
NRC Senior Resident Inspector
NRC NRR Project Manager
CD Sonoda – BPA
EFSECutc.wa.gov – EFSEC
E Fordham – WDOH
R Brice – WDOH
L Albin – WDOH

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RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

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 (TS) 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 (LCO), 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).

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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.

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NRC REQUEST No. 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.

ENERGY NORTHWEST RESPONSE TO RAI STSB-1:

The design and engineered features that were rooted in the staff's approval for amendment 197 continue to remain integrated into Columbia's design. Enhancements that were realized through implementation of a series of commitments reflected in amendment 197 continue to remain an integral part of Columbia's conduct of operations. Columbia's commitment to the operational restrictions or requirements imposed on plant operation by Amendment 197 remains in place.

NRC REQUEST No. 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.

ENERGY NORTHWEST RESPONSE TO RAI STSB-2:

While the division in Columbia's LCO 3.8.7 does not exactly match the standard TS LCO 3.8.9, it is functionally equivalent and therefore the overall logic basis of TSTF-439 is applicable. The second completion time associated with standard TS 3.8.9 allows a maximum of 16 hours which is twice the longest completion time (associated with CONDITION A). The second completion time of Columbia's TS 3.8.7 similarly allows a maximum of 16 hours, again twice the longest completion time associated with CONDITION A. Columbia's CONDITION A applies when Division 1 OR Division 2 AC subsystems are inoperable. Standard TS CONDITION A applies with one or more AC subsystems inoperable. Loss of Division 1 and 2 AC subsystems at Columbia would trigger safety function assessment and CONDITION F entry as warranted. A scenario in which any of the standard completion times would be further limited by the 16 hour second completion time would only apply in a highly unlikely scenario directly as depicted in Figure 2 of TSTF-439 (see figure below) whereby CONDITION A was entered, exited and re-entered in a span of less than 2 hours with a CONDITION B

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entry ongoing to bridge the period between the two entries of CONDITION A. The lack of a dedicated condition in Columbia's LCO 3.8.7 associated with inoperable AC vital busses does not change this logic since the completion time associated with inoperable vital buses is 2 hours in the standard TS. This 2-hour time is comparable to the 2-hour time associated with DC subsystems, Columbia's Condition B. Overlapping inoperabilities with 2-hour completion times will already result in less than 16 hours of total action time. As outlined below, the programs established as an acceptable basis for eliminating second completion times in TSTF-439 are present at Columbia and justify the deletion of Columbia's 16-hour second completion times.

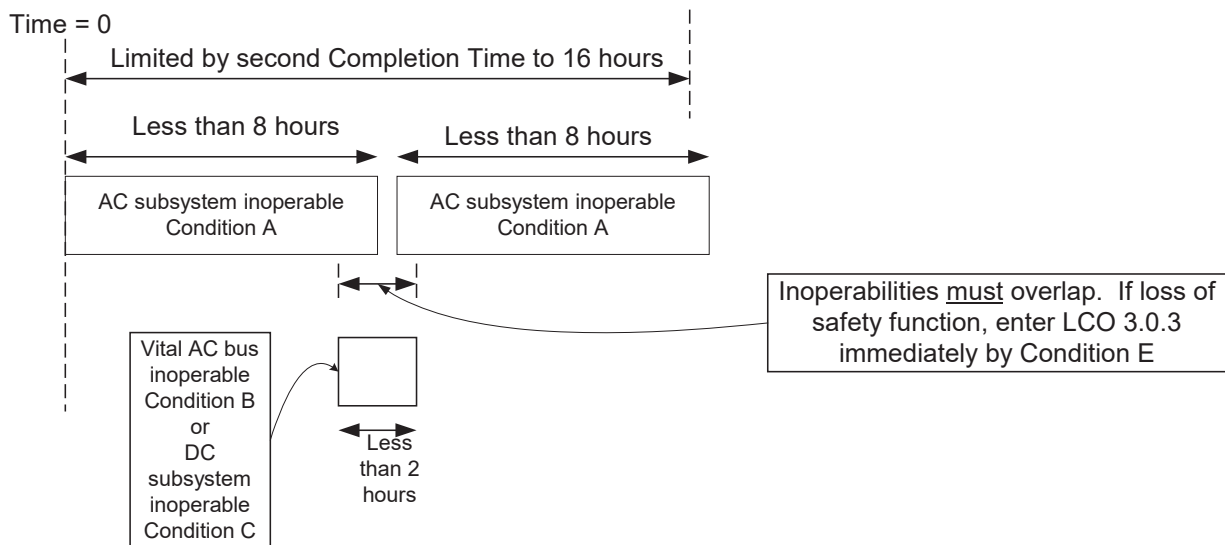


Figure associated with Example 2 of TSTF-439

Consistent with the justification provided in TSTF-439, the second completion time is not needed. Credit is taken for the Maintenance Rule and example 2 of TSTF-439. Should any overlapping inoperabilities that result in a loss of safety function occur (TS 3.8.7, CONDITION F), a plant shutdown in accordance with LCO 3.0.3 is required (TS 3.8.7, REQUIRED ACTION F.1).

The Maintenance Rule, 10 CFR 50.65(a)(1), requires each licensee to monitor the performance or condition of structures, systems, and components (SSC) against licensee-established goals to ensure that the SSCs are capable of fulfilling their intended functions. If the performance or condition of an SSC does not meet established goals, appropriate corrective action is required to be taken.

The NRC Resident Inspectors monitor the Corrective Action process and could take action if the licensee's maintenance program allowed the systems required by a single LCO to become concurrently inoperable multiple times. The performance and condition monitoring activities required by 10 CFR 50.65(a)(1) and (a)(2) would identify if poor

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maintenance practices resulted in multiple entries into the actions of the TS and unacceptable unavailability of these SSCs. The effectiveness of these performance monitoring activities, and associated corrective actions, is evaluated at least every refueling cycle, not to exceed 24 months per 10 CFR 50.65(a)(3).

Columbia's Maintenance Rule provides a strong disincentive to continued operation with concurrent multiple inoperabilities of the type the second Completion Times were designed to prevent.