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August 24, 2021

GO2-21-101

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 REMOVE LICENSE CONDITION 2.C.(34) AND REVISE LICENSE
CONDITION 2.C.(35)**

- References:
1. Letter from A. Javorik, Energy Northwest, to NRC, "License Amendment Request to Remove License Condition 2.C.(34) and Revise License Condition 2.C.(35)," dated April 28, 2021 (ADAMS Accession Number ML21118A812).
 2. Email from M. Chawla, NRC, to R.M. Garcia, Energy Northwest, "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)," dated July 28, 2021 (ADAMS Accession Number ML21209A979).

Dear Sir or Madam:

By Reference 1 Energy Northwest submitted a License Amendment Request to remove license condition (LC) 2.C.(34) and revise LC 2.C.(35). 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.

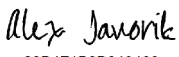
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I declare under penalty of perjury that the foregoing is true and correct.

Executed this 24th day of August, 2021.

Respectfully,

DocuSigned by:

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Alex L. Javorik
Vice President Engineering Projects

Enclosures: 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

NRC REQUEST 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.

Requested Information

(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

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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.

ENERGY NORTHWEST RESPONSE TO NLRP-RAI-1:

The intent of the change to license condition 2.C.(35) was to convey that the commitments identified in NUREG-2123 Appendix A Table A-1 have been incorporated into the Columbia Final Safety Analysis Report (FSAR). Energy Northwest was not clear in stating as part of the incorporation that the 50.59 change process was applied to certain commitments that were completed "one-time" activities or required by a specific license condition. These commitments were removed from the incorporated FSAR Appendix A, Table A-1.

Energy Northwest's intent was to include all commitments from Appendix A of NUREG-2123 *except* for commitment numbers 55, 56, 57, and 71. Therefore, Energy Northwest proposes the revised the wording for license condition 2.C.(35) as follows:

- (35) The licensee's FSAR, as updated with the license renewal FSAR supplement submitted pursuant to 10 CFR 54.21(d) and supplemented with Appendix A of NUREG-2123 with the exception of Commitments Nos. 55, 56, 57, and 71, and 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.

Energy Northwest has provided revised markup and retyped pages as attachments to this enclosure.

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Attachment 1

Proposed Columbia Operating License Changes (Mark-Up)

(34) The information in the FSAR supplement, submitted pursuant to 10 CFR 54.21(d), 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, "Safety Evaluation Report Related to the License Renewal of Columbia Generating Station" dated May 2012, is henceforth part of the FSAR which will be updated in accordance with 10 CFR 50.71(e). As such, the licensee may make changes to the programs and activities described in the UFSAR supplement and 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 provided the licensee evaluates such changes pursuant to the criteria set forth in 10 CFR 50.59 and otherwise complies with the requirements in that section.

DELETED

(34) The licensee's FSAR, as updated with the license renewal FSAR supplement submitted pursuant to 10 CFR 54.21(d) and supplemented with Appendix A of NUREG-2123 with the exception of Commitments Nos. 55, 56, 57, and 71, and 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.

(35) To prevent lateral motion of the core plate, the licensee shall install core plate wedges around the periphery of the core plate within the shroud on or before December 20, 2021. Upon completion of the core plate wedge installation, the licensee shall submit a written report to the NRC staff summarizing the results of the installation. The licensee shall also submit a written report regarding any corrective action taken related to core plate rim hold-down bolts or core plate wedges and the results of extent of condition reviews on or before December 20, 2021.

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Proposed Columbia Operating License Changes (Re-Typed)

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- (34) Deleted.
- (35) The licensee's FSAR, as updated with the license renewal FSAR supplement submitted pursuant to 10 CFR 54.21(d) and supplemented with Appendix A of NUREG-2123 with the exception of Commitments Nos. 55, 56, 57, and 71, and as revised pursuant to the criteria set forth in 10 CFR 50.59, describes certain future programs and activities to be completed before the period of extended operation. Energy Northwest shall complete these activities no later than July 20, 2023 and shall notify the NRC in writing when implementation of these activities is complete.
- (36) To prevent lateral motion of the core plate, the licensee shall install core plate wedges around the periphery of the core plate within the shroud on or before December 20, 2021. Upon completion of the core plate wedge installation, the licensee shall submit a written report to the NRC staff summarizing the results of the installation. The licensee shall also submit a written report regarding any corrective action taken related to core plate rim hold-down bolts or core plate wedges and the results of extent of condition reviews on or before December 20, 2021.

Renewed License No. NPF-21
Amendment No.