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GO2-22-076

10 CFR 54

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Subject: **COLUMBIA GENERATING STATION, DOCKET NO. 50-397
STATUS OF LICENSE RENEWAL COMMITMENTS**

- Reference
1. NUREG-2123 "Safety Evaluation Report Related to the License Renewal of Columbia Generating Station," dated May 2012 (ADAMS ML12139A300 and ML12139A302)
 2. Letter GO2-21-112 "Columbia Generating Station, Docket NO. 50-397 Status of License Renewal Commitments," dated November 15, 2021 (ADAMS ML21319A27)

Dear Sir or Madam,

The purpose of this letter is to notify the U.S. Nuclear Regulatory Commission (NRC) of the completion of certain license renewal commitments (LRC) identified in Reference 1 and as required by Renewed License No. NPF-21 License Condition 2.C.(35) when implementation of these activities is complete.

The table provided in Attachment 1 identifies the LRCs that Energy Northwest is reporting as complete and includes the LRCs reported in Reference 2. The list of Reference 1 item numbers identified in Attachment 2 represent Columbia programs that existed prior to the license renewal application (LRA) and did not require enhancements to comply with the NRC's safety reviews in Reference 1. As such, no program or activity changes were made to these items. Program documentation for these items is available for inspection at the NRC's convenience. The remaining commitments are in the process of being completed.

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No new commitments are being made by this letter or the attachment. If you have any questions or require additional information, please contact Mr. R. M. Garcia, Licensing Supervisor, at (509) 377-8463.

Respectfully,

DocuSigned by:

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Desiree M. Wolfgramm
Regulatory Affairs Manager

Attachments: As stated

cc: NRC RIV Regional Administrator
NRC NRR Project Manager
NRC Senior Resident Inspector
CD Sonoda - BPA/1399
EFSECutc.wa.gov – EFSEC
E Fordham – WDOH
R Brice – WDOH
L Albin – WDOH

Columbia's Completed License Renewal Commitment Table

Commitment No.	Summary/Description	Status
24	<p>The Fatigue Monitoring Program is an existing program that will be continued for the period of extended operation, with the following enhancements:</p> <ul style="list-style-type: none"> • Columbia has analyzed the effects of the reactor coolant environment on fatigue for the six locations recommended by NUREG\CR-6260. These analyses are based on the projected cycles for 60 years of operation (plus some conservatism) rather than the original design cycles in FSAR Table 3.9-1. The Fatigue Monitoring Program will be enhanced to ensure that action will be taken when the lowest number of analyzed cycles is approached. <ul style="list-style-type: none"> – For each location that may exceed a CUF of 1.0 (due to projected cycles exceeding analyzed, or due to as-yet undiscovered industry issues), the Fatigue Monitoring Program will implement one or more of the following: (1) Refine the fatigue analyses to determine valid CUFs less than 1.0, (2) Manage the effects of aging due to fatigue at the affected locations by an inspection program that has been reviewed and approved by the NRC, or (3) Repair or replace the affected locations before exceeding a CUF of 1.0. • Correlate information relative to fatigue monitoring and provide more definitive verification that the transients monitored and their limits are consistent with or bound the FSAR and the supporting fatigue analyses, including the environmentally-assisted fatigue analyses. 	Implemented
31	<p>The High-Voltage Porcelain Insulators Aging Management Program is an existing program that will be continued for the period of extended operation, with the following enhancement:</p> <p>For the in-scope station post insulators located at the Ashe substation, add testing for contamination, and cleaning if required, every 8 years.</p>	Implemented
52	<p>The Thermal Aging and Neutron Embrittlement of Cast Austenitic Stainless Steel (CASS) Program is a new program. The Thermal Aging and Neutron Embrittlement of CASS Program will manage loss of fracture toughness due to thermal aging and neutron irradiation embrittlement of CASS reactor vessel internals.</p> <p>The program includes: (a) identification of susceptible components determined to be limiting from the standpoint of thermal aging or neutron irradiation embrittlement (neutron fluence), (b) a component specific evaluation to determine each identified component's susceptibility to loss of fracture toughness, and (c) a supplemental examination of any component not eliminated by the component specific evaluation.</p>	GO2-19-162 Subsumed in Commitment 10 BWR Vessel Internals Program
55	<p>Incorporate FSAR Supplement into the Columbia FSAR as required by 10 CFR 54.21(d).</p>	Reported Completed in Letter GO2-21-112

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Commitment No.	Summary/Description	Status
56	The elements of corrective actions, confirmation process, and administrative controls in the OQAPD (operational quality assurance program description) will be applied to required aging management programs for both safety-related and non-safety related structures and components determined to require aging management during the period of extended operation."	Reported Completed in Letter GO2-21-112
57	Commitments identified in association with the Columbia license renewal will be tracked within the Columbia Regulatory Commitment Management Program	Reported Completed in Letter GO2-21-112
58	In accordance with the BWR Vessel Internals Program, Columbia will implement the additional inspection requirements of BWRVIP-42-A once those requirements are approved by the NRC staff.	Reported Completed in Letter GO2-21-112
59	Energy Northwest will submit a licensing basis change request to implement the BWRVIP ISP(E) at least two years prior to the period of extended operation. Columbia will implement the ISP(E) as amended by the BWRVIP letter of January 11, 2005, including the new capsule test schedule in Table 1 of that letter.	Reported Completed in Letter GO2-21-112
60	BWRVIP-116 The Columbia site procedure was modified to require any capsules removed from the reactor vessel to be stored in a manner that would support future re-insertion of these capsules in the reactor vessel. Columbia will notify the BWRVIP prior to any change in the storage of on-site materials.	Reported Completed in Letter GO2-21-112
61	Boron Carbide Monitoring Program	Reported Completed in Letter GO2-21-112
65	ISI Program: Prepare and submit the ISI Program Plan for the fourth 10-year interval no later than 2015.	Reported Completed in Letter GO2-21-112
66	Perform a one-time internal inspection of the spent fuel pool telltale drain lines prior to the period of extended operation to confirm the drain lines are free of obstructions. Unexpected inspection results of clogged lines will require a condition report be documented and further engineering evaluation of adverse impacts to the spent fuel pool structure and to identify the periodicity of drain cleaning and maintenance process.	Completed
67	Structures Monitoring Program: Perform borescope inspection of containment sand pocket drain lines to confirm the absence of clogged drain lines and that a flow path exists	Reported Completed in Letter GO2-21-112
68	FAC Program: Ensure that the condensate and feedwater systems are screened and evaluated for cavitation prior to entering the PEO.	Reported Completed in Letter GO2-21-112
69	Re-evaluate the portions of the reactor pressure vessel beltline welds BG and BM for the period of extended operation (54 EFPY), in accordance with the requirements of the ASME Code, Section XI, IWB- 3600 based on the results of 2015 inservice inspection.	Reported Completed in Letter GO2-21-112
70	Perform a 54 EFPY equivalent margin analysis for the embrittlement (upper shelf energy) of the reactor vessel N12 (instrumentation) nozzle forgings.	Reported Completed in Letter GO2-21-112

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Attachment 1

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Commitment No.	Summary/Description	Status
71	<p>At least two years prior to the period of extended operation, Columbia will install core plate wedges unless:</p> <ol style="list-style-type: none"> 1) A site-specific analysis is approved by the NRC that resolves core plate bolt loss of preload due to both stress relaxation and cracking, or 2) An NRC approved method is developed to inspect the core plate bolts for cracking and a site-specific analysis for loss of preload due to stress relaxation of the core plate bolts is approved by the NRC. <p>LC 2.C.(56)</p> <p>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.</p>	<p>Reported Completed in Letter GO2-21-112</p>

Existing Columbia Programs Not Requiring Enhancements

Item Number/Title	Commitment Statement from NUREG-2123 Table A-1	SER SECTION
3. Appendix J Program	The Appendix J Program is an existing program that will be continued for the period of extended operation.	3.0.3.1.1
4. Bolting Integrity Program	The Bolting Integrity Program is an existing program that will be continued for the period of extended operation.	3.0.3.2.2
6. BWR Feedwater Nozzle Program	The BWR Feedwater Nozzle Program is an existing program that will be continued for the period of extended operation.	3.0.3.1.2
7. BWR Penetrations Program	The BWR Penetrations Program is an existing program that will be continued for the period of extended operation.	3.0.3.1.3
8. BWR Stress Corrosion Cracking Program	The BWR Stress Corrosion Cracking Program is an existing program that will be continued for the period of extended operation.	3.0.3.1.4
9. BWR Vessel ID Attachment Welds Program	The BWR Vessel ID Attachment Welds Program is an existing program that will be continued for the period of extended operation.	3.0.3.1.5
10. BWR Vessel Internals Program	The BWR Vessel Internals Program is an existing program that will be continued for the period of extended operation.	3.0.3.1.6
11. BWR Water Chemistry Program	The BWR Water Chemistry Program is an existing program that will be continued for the period of extended operation.	3.0.3.1.7
15. CRDRL Nozzle Program	The CRDRL Nozzle Program is an existing program that will be continued for the period of extended operation.	3.0.3.1.10
22. EQ Program	The EQ Program is an existing program that will be continued for the period of extended operation.	3.0.3.1.16
25. Fire Protection Program	The Fire Protection Program is an existing program that will be continued for the period of extended operation.	3.0.3.2.8
29. Fuel Oil Chemistry Program	The Fuel Oil Chemistry Program is an existing program that will be continued for the period of extended operation.	3.0.3.2.12
33. Inservice Inspection (ISI) Program	The Inservice Inspection (ISI) Program is an existing program that will be continued for the period of extended operation.	3.0.3.1.19
34. Inservice Inspection (ISI) Program – IWE	The Inservice Inspection (ISI) Program – IWE is an existing program that will be continued for the period of extended operation.	3.0.3.1.20
35. Inservice Inspection (ISI) Program – IWF	The Inservice Inspection (ISI) Program - IWF is an existing program that will be continued for the period of extended operation.	3.0.3.1.21
39. Material Handling System Inspection Program	The Material Handling System Inspection Program is an existing program that will be continued for the period of extended operation.	3.0.3.2.15
44. Preventive Maintenance – RCIC Turbine Casing	The Preventive Maintenance – RCIC Turbine Casing is an existing program that will be continued for the period of extended operation.	3.0.3.3.10
45. Reactor Head Closure Studs Program	The Reactor Head Closure Studs Program is an existing program that will be continued for the period of extended operation.	3.0.3.1.24
46. Reactor Vessel Surveillance Program	The Reactor Vessel Surveillance Program is an existing program that will be continued for the period of extended operation.	3.0.3.1.25
62. Service Level 1 Protective Coatings Program	The Service Level 1 Protective Coatings Program is an existing program that will be continued for the period of extended operation.	3.0.3.3.12