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March 9, 2023

10 CFR 50.90

GO2-23-035

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

Subject: **COLUMBIA GENERATING STATION, DOCKET NO. 50-397 SUPPLEMENT TO LICENSE AMENDMENT REQUEST TO ADOPT TSTF-580, "PROVIDE EXCEPTION FROM ENTERING MODE 4 WITH NO OPERABLE RHR SHUTDOWN COOLING"**

Reference: Letter from D. Brown (Energy Northwest) to U.S. Nuclear Regulatory Commission, "Application to Revise Technical Specifications to Adopt TSTF-580, 'Provide Exception from Entering Mode 4 With No Operable RHR Shutdown Cooling' Using the Consolidated Line Item Improvement Process," dated May 25, 2022 (ADAMS Accession No. ML22145A465)

Dear Sir or Madam:

In the referenced letter, Energy Northwest requested an amendment to the Columbia Generating Station (Columbia) Technical Specifications (TS). The proposed amendment provides a TS exception to entering Mode 4 if both required Residual Heat Removal shutdown cooling subsystems are inoperable.

The information contained in the attachments to this letter supplements the referenced letter to provide corrected TS page mark-ups and corrected clean TS pages. The information provided in this supplement does not affect the Technical Analysis or No Significant Hazards Consideration conclusions contained in the license amendment request, and does not affect the bases for concluding that neither an environmental impact statement nor an environmental assessment needs to be prepared in connection with the proposed amendment.

In accordance with 10 CFR 50.91, Energy Northwest is notifying the State of Washington of this amendment supplement by transmitting a copy of this letter and attachments to the designated State Official.

This letter and its attachments contain no new commitments.

If there are any questions or if additional information is needed, please contact Mr. R.M. Garcia, Licensing Supervisor, at 509-377-8463.

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

Executed this 9th day of March 2023.

Respectfully,

DocuSigned by:
Randall A. Prewett
F7AEB59EF6D346A...

for David Brown

David P. Brown
Site Vice President

Attachment: 1. Proposed Columbia Technical Specification Changes (Mark-Up)
2. Revised Columbia Technical Specification Pages

cc: NRC RIV Regional Administrator
NRC NRR Project Manager
NRC Senior Resident Inspector/988C
CD Sonoda – BPA/1399
EFSEC@efsec.wa.gov – EFSEC
E Fordham – WDOH
R Brice – WDOH
L Albin – WDOH

Proposed Columbia Technical Specification Changes (Mark-Up)

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.9 Residual Heat Removal (RHR) Shutdown Cooling System - Hot Shutdown

LCO 3.4.9 Two RHR shutdown cooling subsystems shall be OPERABLE, and, with no recirculation pump in operation, at least one RHR shutdown cooling subsystem shall be in operation.

----------NOTES----------

1. Both RHR shutdown cooling subsystems and recirculation pumps may be removed from operation for up to 2 hours per 8 hour period.

2. One RHR shutdown cooling subsystem may be inoperable for up to 2 hours for performance of Surveillances.

APPLICABILITY: MODE 3 with reactor steam dome pressure less than 48 psig.

ACTIONS

----------NOTE----------

Separate Condition entry is allowed for each RHR shutdown cooling subsystem.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One ~~or two~~ RHR shutdown cooling subsystem~~s~~ inoperable.	A.1 Verify an alternate method of decay heat removal is available f~~or each inoperable RHR shutdown cooling subsystem~~.	1 hour <u>AND</u> Once per 24 hours thereafter
B. Required Action and associated Completion Time of Condition A not met.	B.1 Initiate action to restore RHR shutdown cooling subsystem~~(s)~~ to OPERABLE status.	Immediately

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. Two RHR shutdown cooling subsystems inoperable.	C.1 Verify an alternate method of decay heat removal is available for each inoperable RHR shutdown cooling subsystem.	1 hour AND Once per 24 hours thereafter
D. Required Action and associated Completion Time of Condition C not met.	----------NOTE---------- LCO 3.0.3 and all other LCO Required Actions requiring a MODE change to MODE 4 may be suspended until one RHR shutdown cooling subsystem is restored to OPERABLE status. ---------- D.1 Initiate action to restore one RHR shutdown cooling subsystem to OPERABLE status.	 Immediately
~~E~~C. No RHR shutdown cooling subsystem in operation. AND No recirculation pump in operation.	~~E~~C.1 Initiate action to restore one RHR shutdown cooling subsystem or one recirculation pump to operation. AND ~~E~~C.2 Verify reactor coolant circulation by an alternate method. AND ~~E~~C.3 Monitor reactor coolant temperature and pressure.	Immediately 1 hour from discovery of no reactor coolant circulation AND Once per 12 hours thereafter Once per hour

SURVEILLANCE REQUIREMENTS

	SURVEILLANCE	FREQUENCY
SR 3.4.9.1	----------NOTE---------- Not required to be met until 2 hours after reactor steam dome pressure is less than 48 psig. ---------- Verify one RHR shutdown cooling subsystem or recirculation pump is operating.	In accordance with the Surveillance Frequency Control Program
SR 3.4.9.2	----------NOTE---------- Not required to be performed until 12 hours after reactor steam dome pressure is < 48 psig. ---------- Verify RHR shutdown cooling subsystem locations susceptible to gas accumulation are sufficiently filled with water.	In accordance with the Surveillance Frequency Control Program

Revised Columbia Technical Specification Pages

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.9 Residual Heat Removal (RHR) Shutdown Cooling System - Hot Shutdown

LCO 3.4.9 Two RHR shutdown cooling subsystems shall be OPERABLE, and, with no recirculation pump in operation, at least one RHR shutdown cooling subsystem shall be in operation.

----------NOTES----------

1. Both RHR shutdown cooling subsystems and recirculation pumps may be removed from operation for up to 2 hours per 8 hour period.

2. One RHR shutdown cooling subsystem may be inoperable for up to 2 hours for performance of Surveillances.

APPLICABILITY: MODE 3 with reactor steam dome pressure less than 48 psig.

ACTIONS

----------NOTE----------

Separate Condition entry is allowed for each RHR shutdown cooling subsystem.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One RHR shutdown cooling subsystem inoperable.	A.1 Verify an alternate method of decay heat removal is available.	1 hour AND Once per 24 hours thereafter
B. Required Action and associated Completion Time of Condition A not met.	B.1 Initiate action to restore RHR shutdown cooling subsystem to OPERABLE status.	Immediately

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. Two RHR shutdown cooling subsystems inoperable.	C.1 Verify an alternate method of decay heat removal is available for each inoperable RHR shutdown cooling subsystem.	1 hour AND Once per 24 hours thereafter
D. Required Action and associated Completion Time of Condition C not met.	----------NOTE---------- LCO 3.0.3 and all other LCO Required Actions requiring a MODE change to MODE 4 may be suspended until one RHR shutdown cooling subsystem is restored to OPERABLE status. ---------- D.1 Initiate action to restore one RHR shutdown cooling subsystem to OPERABLE status.	 Immediately
E. No RHR shutdown cooling subsystem in operation. AND No recirculation pump in operation.	E.1 Initiate action to restore one RHR shutdown cooling subsystem or one recirculation pump to operation. AND E.2 Verify reactor coolant circulation by an alternate method. AND E.3 Monitor reactor coolant temperature and pressure.	Immediately 1 hour from discovery of no reactor coolant circulation AND Once per 12 hours thereafter Once per hour

SURVEILLANCE REQUIREMENTS

	SURVEILLANCE	FREQUENCY
SR 3.4.9.1	----------NOTE---------- Not required to be met until 2 hours after reactor steam dome pressure is less than 48 psig. ---------- Verify one RHR shutdown cooling subsystem or recirculation pump is operating.	In accordance with the Surveillance Frequency Control Program
SR 3.4.9.2	----------NOTE---------- Not required to be performed until 12 hours after reactor steam dome pressure is < 48 psig. ---------- Verify RHR shutdown cooling subsystem locations susceptible to gas accumulation are sufficiently filled with water.	In accordance with the Surveillance Frequency Control Program