



Jeremy S. Hauger  
Columbia Generating Station  
P.O. Box 968, PE30  
Richland, WA 99352-0968  
509.377.8727  
jshauger@energy-northwest.com

November 21, 2024

GO2-24-124

10 CFR 21.21(a)(2)

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

Subject: **COLUMBIA GENERATING STATION, DOCKET NO. 50-397  
INTERIM REPORT OF THE EVALUATION OF A DEVIATION  
PURSUANT TO 10 CFR 21.21(a)(2)**

Dear Sir or Madam:

Valcor Engineering supplied substitute environmentally qualified O-rings for Type V70900-45 valves. The justification for similarity of the new compound O-ring to the originally qualified O-ring is documented in Delta Qualification Report QRSKC296022-1 which performed aging tests on both the original compound and substitute compound to establish similarity. The review of the Delta Qualification report determined that the report provided thermal aging to achieve a qualified life that was intended to be greater than the original compound O-rings. The report did not adequately account for temperature rise associated with continuously energized valves and was therefore lacking appropriate thermal aging time to achieve a qualified life that was equal to or greater than the original compound O-ring.

On September 26, 2024, Valcor identified to Columbia Generating Station (CGS) that the new compound O-rings were installed in a supplied valve. At that time, CGS determined that this valve was installed in an EQ application on July 3, 2024.

CGS has determined that additional time beyond the 60-day evaluation period is needed to perform testing which will determine if the new compound's thermal aging characteristics are the same as or better than the original. The testing and subsequent analysis will determine if there is an actual impact to the qualified life of the component based on the change in material. The completion date has not yet been identified by the vendor.

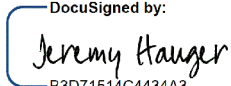
**GO2-24-124**

**Page 2 of 2**

If you have any questions or require additional information, please contact Mr. Ian Bitner, Regulatory Compliance Supervisor, at (509) 377-4204.

Executed this 21st day of November, 2024.

Respectfully,

DocuSigned by:  
  
B3D71514C4434A3...  
Jeremy S. Hauger  
Vice President, Engineering

cc: NRC RIV Regional Administrator  
NRC NRR Project Manager  
NRC Senior Resident Inspector/988C  
CD Sonoda – BPA/1399  
Matt Hopkins - Winston & Strawn