



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

July 24, 2025

Mr. Robert Schuetz
Chief Executive Officer
Energy Northwest
Mail Drop 1023
76 North Power Plant Loop
P.O. Box 968
Richland, WA 99352

SUBJECT: COLUMBIA GENERATING STATION ISSUANCE - OF AMENDMENT NO. 278
REGARDING ADOPTION OF TSTF-65-A, REVISION 1, "USE OF GENERIC
TITLES FOR UTILITY POSITIONS" (EPID L-2025-LLA-0041)

Dear Mr. Schuetz:

The U.S. Nuclear Regulatory Commission (the Commission) has issued the enclosed Amendment No. 278 to Renewed Facility Operating License No. NPF-21 for the Columbia Generating Station (Columbia). The amendment consists of changes to the technical specifications (TSs) in response to your application dated February 27, 2025, as supplemented by letters dated April 1, 2025, and June 19, 2025.

The amendment allows the use of generic personnel titles instead of plant-specific titles. Additionally, an enhancement is proposed to replace the term "plant-specific titles" with "generic titles" in TS section 5.0, "Administrative Controls," and to use appropriately decapitalized titles for positions, ensuring consistency with the Columbia TSs listed sections. None of the proposed changes result in changes to technical requirements.

A copy of the related Safety Evaluation is also enclosed. Notice of Issuance will be included in the Commission's monthly *Federal Register* notice.

Sincerely,

/RA/

Mahesh L. Chawla, Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-397

Enclosures:

1. Amendment No. 278 to NPF-21
2. Safety Evaluation

cc: Listserv



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

ENERGY NORTHWEST

DOCKET NO. 50-397

COLUMBIA GENERATING STATION

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 278
License No. NPF-21

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Energy Northwest (the licensee), dated February 27, 2025, as supplemented by letters dated April 1, 2025, and June 19, 2025, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Renewed Facility Operating License No. NPF-21 is hereby amended to read as follows:

- (2) Technical Specifications and Environmental Protection Plan

- The Technical Specifications contained in Appendix A, as revised through Amendment No. 278 and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the renewed license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. The license amendment is effective as of its date of issuance and shall be implemented within 60 days from the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Tony Nakanishi, Chief
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment:
Changes to Renewed Facility
Operating License No. NPF-21
and the Technical Specifications

Date of Issuance: July 24, 2025

ATTACHMENT TO LICENSE AMENDMENT NO. 278 TO
RENEWED FACILITY OPERATING LICENSE NO. NPF-21
COLUMBIA GENERATING STATION
DOCKET NO. 50-397

Replace the following pages of Renewed Facility Operating License No. NPF-21 and the Appendix A, Technical Specifications, with the attached revised pages. The revised pages are identified by amendment number and contain vertical lines indicating the areas of change.

Renewed Facility Operating License

REMOVE
-4-

INSERT
-4-

Technical Specification

REMOVE

INSERT

5.1-1
5.2-1
5.2-2
5.3-1
5.5-1
5.7-2

5.1-1
5.2-1
5.2-2
5.3-1
5.5-1
5.7-2

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 278 and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the renewed license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

- a. For Surveillance Requirements (SRs) not previously performed by existing SRs or other plant tests, the requirement will be considered met on the implementation date and the next required test will be at the interval specified in the Technical Specifications as revised in Amendment No. 149.

(3) Deleted.

(4) Deleted.

(5) Deleted.

(6) Deleted.

(7) Deleted.

(8) Deleted.

(9) Deleted.

(10) Deleted.

(11) Deleted.

(12) Deleted.

(13) Deleted.

5.0 ADMINISTRATIVE CONTROLS

5.1 Responsibility

- 5.1.1 The plant manager shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence.
- The plant manager or his designee shall approve, prior to implementation, each proposed test, experiment, and modification to systems or equipment that affect nuclear safety.
- 5.1.2 The Shift Manager (SM) shall be responsible for the control room command function. During any absence of the SM from the control room while the unit is in MODE 1, 2, or 3, an individual with an active Senior Reactor Operator (SRO) license shall be designated to assume the control room command function. During any absence of the SM from the control room while the unit is in MODE 4 or 5, an individual with an active SRO license or Reactor Operator license shall be designated to assume the control room command function.
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5.0 ADMINISTRATIVE CONTROLS

5.2 Organization

5.2.1 Onsite and Offsite Organizations

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting safety of the nuclear power plant.

- a. Lines of authority, responsibility, and communication shall be defined and established throughout highest management levels, intermediate levels, and all operating organization positions. These relationships shall be documented and updated, as appropriate, in organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements, including the plant-specific titles of those personnel fulfilling the responsibilities of the positions delineated in these Technical Specifications shall be documented in the FSAR or Operational Quality Assurance Program Description.
- b. The plant manager shall be responsible for overall safe operation of the plant and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
- c. A specified corporate officer shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
- d. The individuals who train the operating staff, carry out health physics, or perform quality assurance functions may report to the appropriate onsite manager; however, these individuals shall have sufficient organizational freedom to ensure their independence from operating pressures.

5.2.2 Unit Staff

The unit staff organization shall include the following:

- a. At least two non-licensed operators shall be assigned when the unit is in MODES 1, 2, or 3; and at least one non-licensed operator shall be assigned when the unit is in MODE 4 or 5.
- b. Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and 5.2.2.a and 5.2.2.f for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.

5.2 Organization

5.2.2 Unit Staff (continued)

- c. An individual qualified to implement radiation protection procedures shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.
 - d. Deleted.
 - e. The operations director or assistant operations manager shall hold an SRO license.
 - f. An individual shall provide advisory technical support to the unit operations shift crew in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. This individual shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.
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5.0 ADMINISTRATIVE CONTROLS

5.3 Unit Staff Qualifications

- 5.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS N18.1-1971, for comparable positions described in the FSAR, except for:
- a. The operations director, who shall meet the requirements of ANSI/ANS N18.1-1971 with the exception that in lieu of meeting the stated ANSI/ANS requirement to hold a Senior Reactor Operator (SRO) license at the time of appointment to the position, the operations director shall:
 - 1. Hold an SRO license at the time of appointment;
 - 2. Have held an SRO license; or
 - 3. Have been certified for equivalent SRO knowledge; and
 - b. The radiation protection manager, who shall meet or exceed the qualifications of Regulatory Guide 1.8, Revision 1-R, May 1977.
- 5.3.2 For the purpose of 10 CFR 55.4, a licensed SRO and a licensed Reactor Operator (RO) are those individuals who, in addition to meeting the requirements of Specification 5.3.1, perform the functions described in 10 CFR 50.54(m).
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5.0 ADMINISTRATIVE CONTROLS

5.5 Programs and Manuals

The following programs shall be established, implemented, and maintained.

5.5.1 Offsite Dose Calculation Manual (ODCM)

- a. The ODCM shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm and trip setpoints, and in the conduct of the radiological environmental monitoring program; and
- b. The ODCM shall also contain the radioactive effluent controls and radiological environmental monitoring activities, and descriptions of the information that should be included in the Annual Radiological Environmental Operating and Radioactive Effluent Release reports required by Specification 5.6.1 and Specification 5.6.2.
- c. Licensee initiated changes to the ODCM:
 1. Shall be documented and records of reviews performed shall be retained. This documentation shall contain:
 - (a) Sufficient information to support the change(s) together with the appropriate analyses or evaluations justifying the change(s), and
 - (b) A determination that the change(s) maintain the levels of radioactive effluent control required pursuant to 10 CFR 20.1302, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I, and do not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations;
 2. Shall become effective after review and acceptance by the Plant Operations Committee and the approval of the plant manager; and
 3. Shall be submitted to the NRC in the form of a complete, legible copy of the entire ODCM as a part of, or concurrent with, the Radioactive Effluent Release Report for the period of the report in which any change in the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (i.e., month and year) the change was implemented.

5.7 High Radiation Area

5.7.1 High Radiation Areas with Dose Rates not Exceeding 1.0 rem/hour (at 30 centimeters from the radiation sources or from any surface penetrated by the radiation) (continued)

- (ii) Be under the surveillance, as specified in the RWP or equivalent, while in the area, by means of closed circuit television, of personnel qualified in radiation protection procedures, responsible for controlling personnel radiation exposure in the area, and with the means to communicate with individuals in the area who are covered by such surveillance.
- e. Except for individuals qualified in radiation protection procedures, or personnel continuously escorted by such individuals, entry into such areas shall be made only after dose rates in the area have been determined and entry personnel are knowledgeable of them. These continuously escorted personnel will receive a pre-job briefing prior to entry into such areas. This dose rate determination, knowledge, and pre-job briefing does not require documentation prior to initial entry.

5.7.2 High Radiation Areas with Dose Rates Greater than 1.0 rem/hour (at 30 centimeters from the radiation sources or from any surface penetrated by the radiation), but less than 500 rads/hour (at 1 meter from the radiation sources or from any surface penetrated by the radiation)

- a. Each entryway to such an area shall be conspicuously posted as a high radiation area and shall be provided with a locked or continuously guarded door or gate that prevents unauthorized entry, and in addition:
 - 1. All such door and gate keys shall be maintained under the administrative control of the Shift Supervisor, radiation protection manager, or his or her designee.
 - 2. Doors and gates shall remain locked except during periods of personnel or equipment entry or exit.
- b. Access to, and activities in, each such area shall be controlled by means of an RWP or equivalent that includes specification of radiation dose rates in the immediate work area(s) and other appropriate radiation protection equipment and measures.
- c. Individuals qualified in radiation protection procedures may be exempted from the requirement for an RWP or equivalent while performing radiation surveys in such areas provided that they are otherwise following plant radiation protection procedures for entry to, exit from, and work in such areas.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 278 TO

RENEWED FACILITY OPERATING LICENSE NO. NPF-21

ENERGY NORTHWEST

COLUMBIA GENERATING STATION

DOCKET NO. 50-397

1.0 INTRODUCTION

By application dated February 27, 2025 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML25058A497), as supplemented by letters dated April 1, 2025, and June 19, 2025 (ML25091A193 and ML25174A209, respectively), Energy Northwest (the licensee) requested changes to the Technical Specifications (TSs) for Columbia Generating Station (Columbia).

The proposed changes would allow the use of generic personnel titles instead of plant-specific titles. Additionally, an enhancement is proposed to replace the term "plant-specific titles" with "generic titles" in TS section 5.0, "Administrative Controls," and to use appropriately decapitalized titles for positions, ensuring consistency with the Columbia TS listed sections. None of the proposed changes would result in changes to technical requirements.

The supplement dated June 19, 2025, provided additional information that clarified the application, did not expand the scope of the application as originally noticed, and did not change the U.S. Nuclear Regulatory Commission (NRC, the Commission) staff's original proposed no significant hazards consideration determination as published in the *Federal Register* (FR) on May 14, 2025 (90 FR 20517).

2.0 REGULATORY EVALUATION

Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.36, "Technical specifications," requires TSs for nuclear reactor facilities to include items in the following categories: (1) safety limits and limiting safety system settings; (2) limiting conditions for operation; (3) surveillance requirements; (4) design features; and (5) administrative controls. The regulation does not

specify the particular requirements to be included in a facility's TSs. The regulation in 10 CFR 50.36(c)(5), "Administrative controls," states, in part:

Administrative controls are the provisions relating to organization and management, procedures, recordkeeping, review and audit, and reporting necessary to assure operation of the facility in a safe manner.

NUREG-1433, Revision 5.0, "Standard Technical Specifications, General Electric BWR/4 Plants," Volume 1, "Specifications" (ML21272A357), contains the improved standard technical specifications (STS) for facilities using the fourth boiling water reactor (BWR) nuclear steam supply system (NSSS) design by General Electric (BWR/4). The changes reflected in Revision 5.0 of NUREG-1433 result from the experience gained from nuclear reactor facility operation using the improved STS and extensive public technical meetings and discussions among the U.S. Nuclear Regulatory Commission (NRC, the Commission) staff, various nuclear reactor facility licensees, and the NSSS owners groups. The revised position titles in NUREG-1433, Revision 5.0, were compared to the proposed changes in Columbia TS section 5.0, "Administrative Controls."

The joint NSSS Owners Groups Technical Specifications Task Force (TSTF) obtained NRC staff approval of improved STS change traveler TSTF-65-A, Revision 1, "Use of generic titles for utility positions" (ML040080572). This traveler proposes the use of generic personnel titles as provided by American National Standards Institute/American Nuclear Society (ANSI/ANS)-3.1, in lieu of plant-specific personnel titles. By incorporating the changes approved in TSTF-65-A into a nuclear reactor facility's TSs, the facility's TS will provide a direct link between the STS required personnel qualifications and the licensee's personnel qualifications, which are currently specified using plant-specific position titles. TSTF-65-A was approved on December 2, 1997, during a public meeting between the NRC and the TSTF, but no written approval from the NRC exists. TSTF-65-A was incorporated into Revision 2.0 of NUREG-1433 (ML011090341), issued in April 2001.

3.0 TECHNICAL EVALUATION

In general, there are two classes of changes to nuclear reactor facility TSs: (1) changes needed to reflect contents of the design basis (TSs are derived from the design basis), and (2) voluntary changes to take advantage of the evolution in policy and guidance as to the required content and preferred format of TSs over time. This amendment deals with the second class of change; namely, administrative changes.

The proposed TS revisions incorporate editorial, administrative, and clarification changes. For these changes to be acceptable, the NRC staff must determine that with these editorial, administrative, and clarification changes, the Columbia TSs will continue to meet the requirements in 10 CFR 50.36.

In its February 27, 2025, application, as supplemented, the licensee proposed non-technical changes to TS 5.1.1 of TS section 5.1, "Responsibility"; TS 5.2.1, "Onsite and Offsite Organizations," and TS 5.2.2, "Unit Staff," of TS section 5.2, "Organization"; TS 5.3.1 of TS section 5.3, "Unit Staff Qualifications"; TS 5.5.1, "Offsite Dose Calculation Manual (ODCM)," of TS section 5.5, "Programs and Manuals"; and TS 5.7.2, "High Radiation Areas with Dose Rates Greater than 1.0 rem/hour (30 Centimeters from the radiation sources or from any surface penetrated by the radiation), but less than 500 rads/hour (at 1 meter from the radiation sources or from any surface penetrated by the radiation)," of TS section 5.7, "High Radiation Area." In

the application, the licensee stated that replacing plant-specific titles with generic titles and changing title case to lower case for selected plant-specific titles have no safety implications, as the responsibilities and requirements of the affected positions are unchanged.

The NRC staff reviewed the proposed changes to the Columbia TSs against the changes approved in TSTF-65-A and the STS in NUREG-1433, Revision 5.0. The proposed changes are the following:

<u>TS</u>	<u>Change</u>
5.1.1	“Plant General Manager” is replaced with “plant manager” in two places
5.2.1.a	Modified last sentence to conform with use of generic title, as shown by insertion of text denoted by underline: “...These requirements, <u>including the plant-specific titles of those personnel fulfilling the responsibilities of the positions delineated in these Technical Specifications</u> shall be documented in the FSAR [Final Safety Analysis Report].”
5.2.1.b	“Plant General Manager” is replaced with “plant manager”
5.2.1.c	“The Chief Executive Officer” is replaced with “A specified corporate officer”
5.2.2.a	“Equipment Operators” is replaced with “non-licensed operators” in two places
5.2.2.e	“Operations Director or Assistant Operations Manager” is replaced with “operations director or assistant operations manager”
5.3.1.a	“Operations Director” is replaced with “operations director” in two places
5.3.1.b	“Radiation Protection Manager” is replaced with “radiation protection manager”
5.5.1.c.2	“Plant General Manager” is replaced with “plant manager”
5.7.2.a.1	“Radiation Protection Manager” is replaced with “radiation protection manager”

The NRC staff verified that these changes are administrative or editorial in nature and are consistent with the corresponding specifications of STS section 5.0. The NRC staff concludes that the revised Columbia TS section 5.0 maintains the administrative controls required by 10 CFR 50.36(c)(5). Therefore, the proposed changes are acceptable.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Washington State official was notified of the proposed issuance of the amendment on June 10, 2025. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendment relates to changes in recordkeeping, reporting, or administrative procedures or requirements. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration as published in the *Federal Register* on May 14, 2025 (90 FR 20517), and there has been no public comment on such finding. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) there is reasonable assurance that such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: Craig Harbuck

Date: July 24, 2025

SUBJECT: COLUMBIA GENERATING STATION ISSUANCE- OF AMENDMENT NO. 278
REGARDING ADOPTION OF TSTF-65-A, REVISION 1, "USE OF GENERIC
TITLES FOR UTILITY POSITIONS" (EPID L-2025-LLA-0041) DATED JULY 24, 2025

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*eConcurrence

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