

October 23, 2003  
GO2-03-165

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

Subject: **COLUMBIA GENERATING STATION, DOCKET NO. 50-397,  
REDUCTION OF COMMITMENT TO THE OPERATIONAL QUALITY  
ASSURANCE PROGRAM DESCRIPTION**

Dear Sir or Madam:

Energy Northwest, in accordance with 10 CFR 50.54(a)(4), is proposing changes to the NRC approved topical report "Operational Quality Assurance Program Description (OQAPD) (WPPSS-QA-004)" and hereby requests NRC approval because this proposed revision would result in a reduction of commitment.

This revision to the OQAPD is necessary to update Appendix III, Additional Quality Program Requirements, Section 2.1.6.e, regarding Plant Operations Committee (POC) responsibilities. The attachment provides a mark-up of the proposed changes.

Appendix III, Section 2.1.6.e of the OQAPD currently contains a commitment for POC to investigate all violations of the plant or ISFSI Technical Specifications, including the preparation and forwarding of reports covering the evaluation and recommendations to prevent recurrence, to the Chief Nuclear Officer (CNO) and to the Corporate Nuclear Safety Review Board (CNSRB).

The proposed change to this section would reduce POC responsibilities to a review function, maintain POC as an independent review body, and allow POC to concentrate on issues that affect nuclear safety as described by ANSI N18.7-1976 and endorsed by Regulatory Guide 1.33, "Quality Assurance Program Requirements (Operation)."

ANSI N18.7-1976, Section 4.3.4 states that "The following subjects shall be reviewed by the independent review body." Of these review subjects, Section 4.3.4(4) describes "Violations, deviations and reportable events, which require reporting to the NRC in writing within 24 hours, such as: (a) Violations of applicable codes, regulations, orders, technical specifications, license requirements, internal procedures or instructions having safety significance."

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Investigations of violations that affect nuclear safety are conducted by line organizations, in accordance with the corrective action program, under the guidance of the performance Management Department. The Performance Management Department reports directly to the Vice President, Nuclear Generation. The results of these investigations, including recommendations to prevent recurrence, are forwarded for review to POC, the CNO, and the CNSRB.

Should the NRC provide written approval of this request or if no response is received from the NRC during the 60 days following this letter, Energy Northwest will implement the changes described in the OQAPD in accordance with 10 CFR 50.54(a)(4)(iv).

Should you have any questions or desire additional information regarding this matter, please call Ms. CL Perino at (509) 377-2075.

Respectfully,



DW Coleman, Manager  
Performance Assessment and Regulatory Programs  
Mail Drop PE20

Attachment

cc: BS Mallett - NRC - RIV  
TC Poindexter - Winston & Strawn  
NRC Sr. Resident Inspector - 988C  
BJ Benney - NRC - NRR  
RN Sherman - BPA/1399

- 1.1.5 Written records of activities associated with independent technical reviews shall be prepared, maintained, and forwarded to the manager responsible for quality assurance.

## 2.0 REVIEW AND AUDIT

### 2.1 PLANT OPERATIONS COMMITTEE (POC)

The POC shall function to advise the manager responsible for plant operations and ISFSI on all matters related to nuclear safety.

- 2.1.1 The POC shall be composed of individuals experienced in one of the following functional areas:

Operations	Administrative Services
Maintenance	Radiation Protection
Engineering	Technical Services
Quality	Chemistry

- 2.1.2 The manager responsible for plant operations and ISFSI, the POC Chairman, shall appoint, in writing, the POC Vice Chairman, and individual members. The qualifications of all members shall meet the requirements of ANSI/ANS-3.1-1981, Section 4.7, and have cumulative expertise in the areas listed in 2.1.1, as a minimum.

- 2.1.3 All POC alternate members shall be appointed in writing by the POC Chairman or Vice Chairman to serve on a temporary basis.


- 2.1.4 The Plant Operations Committee shall meet at least once per calendar month and as convened by the POC Chairman or his designated alternate.

- 2.1.5 The quorum of the POC necessary for the performance of the POC responsibility and authority provisions of these requirements shall consist of the Chairman or Vice Chairman and four members including alternates. No more than two alternates shall make up the quorum.

- 2.1.6 The POC shall be responsible for:

- Review of 10CFR50.59 and 10CFR72.48 Evaluations associated with procedures and programs required by plant and ISFSI Technical Specifications and changes thereto;
- Review of all proposed tests and experiments that affect nuclear safety;
- Review of all proposed changes to the plant or ISFSI Technical Specifications;

Review of all violations and deviations of applicable codes, regulations, orders, technical specifications, license requirements, or internal procedures or instructions that affect nuclear safety. The results of these reviews will be forwarded to the Chief Nuclear Officer and to the Corporate Nuclear Safety Review Board.

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- d. Review of all proposed changes or modifications to plant or ISFSI system or equipment that affect nuclear safety;
  - e. ~~Investigation of all violations of the plant or ISFSI Technical Specifications, including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence, to the Chief Nuclear Officer and to the Corporate Nuclear Safety Review Board;~~
  - f. Review of all REPORTABLE EVENTS, as specified in 10CFR50.73 and 10CFR72.75;
  - g. Review of plant and ISFSI operations to detect potential hazards to nuclear safety;
  - h. Performance of special reviews, investigations, or analyses and reports thereon as requested by the manager responsible for plant operations and ISFSI or the Corporate Nuclear Safety Review Board;
  - i. Review of the Security Plan and submittal of recommended changes to the Corporate Nuclear Safety Review Board;
  - j. Review of the Emergency Plan and submittal of recommended changes to the Corporate Nuclear Safety Review Board;
  - k. Review of any accidental, unplanned, or uncontrolled radioactive release including the preparation of reports covering evaluation, recommendations, and disposition of the corrective action to prevent recurrence and the forwarding of these reports to the Chief Nuclear Officer and to the Corporate Nuclear Safety Review Board; and
  - l. Review of changes to the PROCESS CONTROL PROGRAM and the OFFSITE DOSE CALCULATION MANUAL.

2.1.7 The POC shall:

- a. Recommend in writing to the manager responsible for plant operations and ISFSI approval or disapproval of items considered under Appendix III, 2.1.6a. through d. prior to their implementation.
- b. Render determinations in writing with regard to whether or not each item considered under Appendix III, 2.1.6a. through e. requires prior NRC approval as defined in 10CFR50.59 and 10CFR72.48.