

November 15, 2005  
GO2-05-184

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

Subject: **COLUMBIA GENERATING STATION, DOCKET NO. 50-397  
SUPPLEMENT TO THE LICENSE AMENDMENT REQUEST FOR A ONE-  
TIME EXTENSION TO TECHNICAL SPECIFICATION 3.7.1**

Reference: Energy Northwest letter GO2-05-145, dated August 17, 2005, from WS Oxenford (Energy Northwest) to NRC, "License Amendment Request for One-time Extension of the Completion Time for Condition B of Technical Specification 3.7.1 and Exemption from Note 1 of Required Action B.1"

Dear Sir or Madam:

Transmitted herewith in Attachment 1 is supplemental information regarding the referenced License Amendment Request. A telecom between the NRC and Energy Northwest discussing this supplement was conducted on November 7, 2005. This supplemental information clarifies issues involving the "cascading" of the Service Water subsystem outage into the Diesel Generator Technical Specification (TS).

A revised mark-up of the proposed TS note and the associated TS Bases are provided in Attachment 2 and 3, respectively.

No new commitments are made in this submittal.

This supplemental information does not impact the original no significant hazards determination or the risk assessment used to justify the requested amendment. If you have any questions or require additional information, please contact Michael Brandon (509) 377-4758.


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I declare under penalty of perjury that the foregoing is true and correct. Executed on the date of this letter.

Respectfully,



WS Oxenford  
Vice President, Technical Services  
Mail Drop PE04

Attachment 1: Supplemental Information  
Attachment 2: Revised mark-up of TS 3.7.1  
Attachment 3: Revised mark-up of TS 3.7.1 Bases

cc: BS Mallett – NRC RIV  
BJ Benney – NRC NRR  
NRC Senior Resident Inspector/988C  
RN Sherman – BPA/1399  
WA Horin – Winston & Strawn

**SUPPLEMENT TO THE LICENSE AMENDMENT REQUEST FOR A ONE-TIME  
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**Attachment 1**

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**SUPPLEMENTAL INFORMATION**

**Background**

The referenced submittal requested an amendment to Operating License NPF-21 for Columbia Generating Station (Columbia). The requested amendment revises the Completion Time (CT) for the Required Action of Condition B of Technical Specification (TS) 3.7.1, "Standby Service Water (SW) System and Ultimate Heat Sink (UHS)," from 72 to 144 hours, on a one-time basis and allows a one-time exemption from Note 1 of the Required Action 3.7.1.B.1.

The one-time exemption from Note 1 of Required Action B.1 was requested to avoid entering the Required Action of TS 3.8.1 "AC Sources Operating" for the diesel generator (DG) supported by the inoperable SW B subsystem. Since the CT of the supported DG is also 72 hours, the option of requesting an extension to Required Action B of TS 3.8.1 was considered. As discussed in the referenced submittal, Energy Northwest currently has a CT extension request (for a 14-day CT) for the Required Action B of TS 3.8.1 on the docket under Staff review. An additional request to amend TS 3.8.1.B would result in the undesirable condition of having two differing CT extension requests on the same TS action under staff review at the same time. The 14-day extension currently under staff review is for a significantly longer period than this request and involves a more extensive justification and a more complex set of compensatory measures. Therefore, requesting an exemption from Note 1 of TS 3.7.1.B serves to minimize the complexity of this amendment request.

Consistent with the intent of LCO 3.0.6, the safety function of the DG system will be maintained and provided by the Division 1 DG. If this safety function was lost, then the appropriate TS action would be taken.

As a result of an internal review of this proposed change, a question was raised regarding a potential interpretation of the proposed TS 3.7.1 note. The proposed note was intended to waive the requirement for entering TS 3.8.1 when the Division 2 DG was made inoperable during the performance of the SW 1B pump refurbishment/replacement. One interpretation of the proposed note questioned not entering the Required Actions of TS 3.8.1 if, in addition to solely removing the SW subsystem from service, intentional protective actions were taken to prevent a spurious or unplanned start of the DG during the performance of the work on the SW pump. A review of the work planning package and discussions with plant personnel have determined that administrative controls to prevent a spurious or unplanned start of the DG are prudent to protect the health and reliability of the diesel engine. This protective action will be accomplished by proceduralized actions to place the Division 2 DG control switch in the "Maintenance" position and by isolating the diesel's starting air system when tagging out the associated SW subsystem.

To ensure the note is applied consistent with its original intent, a clarification to the proposed note is provided in this submittal. The explanatory language added to the originally proposed note is shown in the bold italicized text below.

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Attachment 1

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"On a one-time basis, during the refurbishment/replacement of the 1B Service Water Pump during Cycle 18, the COMPLETION TIME for an inoperable service water subsystem is extended to 144 hours. During this extended COMPLETION TIME, *the Division 2 diesel generator will be inoperable due to the inoperability of the supporting SW subsystem and due to the proceduralized actions to preclude a spurious or unplanned start of the diesel.* During this period, *the requirement for entering the applicable Conditions and Required Actions of LCO 3.8.1 as discussed in Note 1 of Required Action B.1 is waived based on the implementation of selected risk management compensatory measures. This one-time COMPLETION TIME extension and exemption for complying with the applicable portions of LCO 3.8.1, specifically Condition B, expires at the end of Cycle 18.*"

A revised marked-up copy of proposed change to the TS is provided in Attachment 2.

Upon approval of the proposed license amendment, Energy Northwest will implement a change to the applicable TS Bases. The changes made to the originally proposed TS Bases are shown in the bold italicized text below.

"On a one-time basis, during the refurbishment/replacement of the 1B Service Water Pump during Cycle 18, the COMPLETION TIME for an inoperable service water subsystem is extended to 144 hours. The one-time extension is based upon a risk assessment performed in accordance with Regulatory Guides 1.174 and 1.177. During this extended COMPLETION TIME, administrative controls must be implemented to enhance the reliability of required electrical sources and to minimize plant activities that might challenge other safety-related equipment. This one-time extension expires at the end of Cycle 18.

During the one-time extended COMPLETION TIME, *the Division 2 diesel generator that is supported by the 1B Service Water subsystem will be inoperable. During the refurbishment/replacement of the 1B Service Water Pump, the Division 2 diesel generator mode switch will be placed in the "Maintenance" position and the air start system will be isolated to prevent a spurious or unplanned start of the diesel generator. The actions taken to preclude the starting of the diesel are prudent protective actions that are procedurally specified when removing the supporting Service Water subsystem from service.* The action to enter *the applicable Condition, Condition B, of LCO 3.8.1, as discussed in Note 1, is waived based on the implementation of selected risk management compensatory measures and the verification that a loss of safety function does not exist.*"

A revised marked-up copy of proposed change to the TS Bases is provided in Attachment 3.

**SUPPLEMENT TO THE LICENSE AMENDMENT REQUEST FOR A ONE-TIME  
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**Attachment 2**

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Revised Mark-up of TS 3.7.1

(page 3.7.1-2)

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. One SW subsystem inoperable.	<p>B.1</p> <p>-----NOTES-----</p> <p>1. Enter applicable Conditions and Required Actions of LCO 3.8.1, "AC Sources - Operating," for diesel generator made inoperable by SW System.*</p> <p>2. Enter applicable Conditions and Required Actions of LCO 3.4.9, "Residual Heat Removal (RHR) Shutdown Cooling System - Hot Shutdown," for RHR shutdown cooling subsystem made inoperable by SW System.</p> <p>-----</p> <p>Restore SW subsystem to OPERABLE status.</p>	<p>72 hours*</p>

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\* On a one-time basis, during the refurbishment/replacement of the 1B Service Water Pump during Cycle 18, the COMPLETION TIME for an inoperable service water subsystem is extended to 144 hours. During this extended COMPLETION TIME, the Division 2 diesel generator will be inoperable due to the inoperability of the supporting SW subsystem and due to the proceduralized actions to preclude a spurious or unplanned start of the diesel. During this period, the requirement for entering the applicable Conditions and Required Actions of LCO 3.8.1 as discussed in Note 1 of Required Action B.1 is waived based on the implementation of selected risk management compensatory measures. This one-time COMPLETION TIME extension and exemption for complying with the applicable portions of LCO 3.8.1, specifically Condition B, expires at the end of Cycle 18.

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**Attachment 3**

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Revised Mark-up of TS Bases 3.7.1

(page B 3.7.1-5)

BASES (continued)

ACTIONS

A.1

On a one-time basis, during the refurbishment/replacement of the 1B Service Water Pump during Cycle 18, the COMPLETION TIME for an inoperable service water subsystem is extended to 144 hours. The one-time extension is based upon a risk assessment performed in accordance with Regulatory Guides 1.174 and 1.177. During this extended COMPLETION TIME, administrative controls must be implemented to enhance the reliability of required electrical sources and to minimize plant activities that might challenge other safety-related equipment. This one-time extension expires at the end of Cycle 18.

With average sediment depth in either or both spray ponds  $\geq 0.5$  and  $< 1.0$  ft, water inventory is reduced such that the combined cooling capability of both spray ponds may be less than required for 30 days of operation after a LOCA. Therefore, action must be taken to restore average sediment depth to  $< 0.5$  ft. The Completion Time of 30 days is based on engineering judgement and plant operating experience and takes into consideration the low probability of a design basis accident occurring in this time period.

B.1

If one SW subsystem is inoperable, it must be restored to OPERABLE status within 72 hours. With the unit in this condition, the remaining OPERABLE SW subsystem is adequate to perform the heat removal function. However, the overall reliability is reduced because a single failure in the OPERABLE SW subsystem could result in loss of SW function. The 72 hour Completion Time was developed taking into account the redundant capabilities afforded by the OPERABLE subsystem and the low probability of a DBA occurring during this period.

The Required Action is modified by two Notes indicating that the applicable Conditions of LCO 3.8.1, "AC Sources - Operating," and LCO 3.4.9, "Residual Heat Removal (RHR) Shutdown Cooling System - Hot Shutdown," be entered and the Required Actions taken if the inoperable SW subsystem results in an inoperable DG or RHR shutdown cooling subsystem, respectively. This is in accordance with LCO 3.0.6 and ensures the proper actions are taken for these components.

C.1 and C.2

If the SW subsystem cannot be restored to OPERABLE status within the associated Completion Time, or both SW subsystems are inoperable, or the UHS is determined inoperable for reasons other than Condition A, the unit must be placed in a MODE in which the LCO does not apply. To achieve this

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During the one-time extended COMPLETION TIME, the Division 2 diesel generator that is supported by the 1B Service Water subsystem will be inoperable. During the refurbishment/replacement of the 1B Service Water Pump, the Division 2 diesel generator mode switch will be placed in the "Maintenance" position and the air start system will be isolated to prevent a spurious or unplanned start of the diesel generator. The actions taken to preclude the starting of the diesel are prudent protective actions that are procedurally specified when removing the supporting Service Water subsystem from service. The action to enter the applicable Condition, Condition B, of LCO 3.8.1, as discussed in Note 1, is waived based on the implementation of selected risk management compensatory measures and the verification that a loss of safety function does not exist.