

MC 3203
ML 06

P.O. Box 968 • Richland, WA • 99352-0968

February 23, 2006
GO2-06-029

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

**Subject: COLUMBIA GENERATING STATION, DOCKET NO. 50-397
CLARIFICATION REGARDING A COMMITMENT ASSOCIATED WITH
THE LICENSE AMENDMENT REQUEST FOR EXTENSION OF DIESEL
GENERATOR COMPLETION TIME**

References: 1) Letter dated May 19, 2004, DK Atkinson (Energy Northwest) to NRC, "Application for Amendment of Facility Operating License No. NPF-21 for Extension of Diesel Generator Completion Time"
2) Letter dated November 4, 2004, WA Macon (NRC) to JV Parrish (Energy Northwest), "Columbia Generating Station - Request for Additional Information (TAC No. MC3203)"
3) Letter dated September 1, 2005, WS Oxenford (Energy Northwest) to NRC, "Response to Request for Additional Information Regarding License Amendment Request for Extension of Diesel Generator Completion Time"
4) Letter dated January 9, 2006, WS Oxenford (Energy Northwest) to NRC, "Clarification of Response for Additional Information Regarding License Amendment Request for Extension of Diesel Generator Completion Time"

Dear Sir or Madam:

By Reference 1 Energy Northwest requested a change to Technical Specification (TS) 3.8.1, "AC Sources Operating," to permit a longer Completion Time for the Division 1 and Division 2 diesel generators (DG).

By Reference 2 the NRC issued a Request for Additional Information (RAI) regarding the basis for the proposed change. By Reference 3 Energy Northwest responded to the RAIs.

On December 8, 2005, Energy Northwest met with NRC staff to discuss this amendment request. At that time NRC staff requested that certain items of discussion be clarified on the docket. This discussion is documented in Reference 4.

**CLARIFICATION REGARDING A COMMITMENT ASSOCIATED WITH THE LICENSE
AMENDMENT REQUEST FOR EXTENSION OF DIESEL GENERATOR COMPLETION
TIME**

Page 2

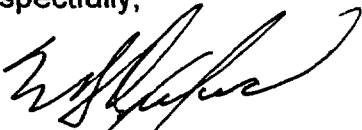
On February 14, 2006, during a conference call between the staff and Energy Northwest, the staff requested clarification on a commitment in Reference 4 associated with the cross-connection of our DG-3 diesel generator during a loss of offsite power or station blackout event.

The clarification requested is attached. This is only a clarification of a previous commitment and does not change any commitments or contain any new commitments.

If you have any questions regarding this matter, please contact GV Cullen, Licensing Supervisor at (509) 377-6105.

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: Commitment Clarification

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

**CLARIFICATION REGARDING A COMMITMENT ASSOCIATED WITH THE LICENSE
AMENDMENT REQUEST FOR EXTENSION OF DIESEL GENERATOR COMPLETION
TIME**

Attachment

Commitment Clarification (Requested during February 14, 2006 teleconference)

Please provide a clarification on the intent of the commitment that Energy Northwest will "establish procedures that during entry into the extended DG CT direct full implementation of the DG-3 cross connect to Division 1 or Division 2 switchgear (SM-7 or SM-8) within two hours of a LOOP or SBO unless plant conditions dictate otherwise." (Emphasis added.) Please identify the type of plant conditions that would dictate otherwise.

Energy Northwest Response:

The intent of this commitment is, during a LOOP or SBO, to establish the DG-3 cross-connection as an additional onsite power source to re-power the low pressure system(s) on the division associated with the DG that is out of service for maintenance and to implement that cross-connection within 2 hours. The words "unless plant conditions dictate otherwise" are intended to refer to unexpected failures that either 1) cause HPCS to be needed to provide adequate core cooling, such as failure of RCIC, or 2) prevent the cross-connection, such as a fault or failure on one or more of the associated buses. This commitment is intended to satisfy concerns previously expressed by the staff.