



**UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-4005**

EA-06-158

August 30, 2006

J. V. Parrish (Mail Drop 1023)
Chief Executive Officer
Energy Northwest
P.O. Box 968
Richland, WA 99352-0968

**SUBJECT: RECHARACTERIZATION OF LICENSEE IDENTIFIED NONCITED VIOLATION
IN NRC INSPECTION REPORT 05000397/2006002; COLUMBIA GENERATING
STATION**

Dear Mr. Parrish:

Thank you for your letter from Mr. W. S. Oxenford, Vice President, Technical Services, dated June 9, 2006, in response to our May 12, 2006, letter and integrated inspection report. In your letter you contested the characterization of a licensee identified noncited violation of very low safety significance (Green) concerning the application of WD-40 penetrating oil to the standby service water pumps. Energy Northwest disagreed with the characterization of this issue as being of more than minor significance.

Energy Northwest provided the following information in support of the position that this issue was minor:

- Application of WD-40 to the pump components provides extremely low to zero increase in the probability of intergranular stress corrosion cracking (IGSCC).
- Any increase in the probability of IGSCC is mitigated by planned preventative maintenance inspections applied to the pumps for the purpose of identifying IGSCC related degradation.
- NRC Manual Chapter 0612, App E, Example 4.f provided a minor example where use of an incorrect sealant was considered minor because the error did not impact the operability of a diesel generator.

After further review, the NRC staff has determined that the application of WD-40 penetrating oil to the standby service water pumps does not constitute a finding of more than minor safety significance due to the very low increase in probability of IGSCC. Therefore, we are recharacterizing the licensee identified noncited violation as minor. We also understand that Energy Northwest has revised the service water pump overhaul procedures to prohibit the use of WD-40 on stainless steel components because it is considered a good practice to avoid the introduction of chlorides and sulfates into these components.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Should you have any questions concerning this matter, please contact Mr. Claude Johnson at 817-860-8148.

Sincerely,

/RA/

Anton Vogel, Deputy Director
Division of Reactor Projects

Docket: 50-397
License: NPF-21

cc:
W. Scott Oxenford (Mail Drop PE04)
Vice President, Technical Services
Energy Northwest
P.O. Box 968
Richland, WA 99352-0968

Albert E. Mouncer (Mail Drop PE01)
Vice President, Corporate Services/
General Counsel/CFO
Energy Northwest
P.O. Box 968
Richland, WA 99352-0968

Chairman
Energy Facility Site Evaluation Council
P.O. Box 43172
Olympia, WA 98504-3172

Douglas W. Coleman (Mail Drop PE20)
Manager, Regulatory Programs
Energy Northwest
P.O. Box 968
Richland, WA 99352-0968

Energy Northwest

-3-

Gregory V. Cullen (Mail Drop PE20)
Supervisor, Licensing
Energy Northwest
P.O. Box 968
Richland, WA 99352-0968

Chairman
Benton County Board of Commissioners
P.O. Box 190
Prosser, WA 99350-0190

Dale K. Atkinson (Mail Drop PE08)
Vice President, Nuclear Generation
Energy Northwest
P.O. Box 968
Richland, WA 99352-0968

Cheryl M. Whitcomb (Mail Drop PE03)
Vice President, Organizational
Performance & Staffing/CKO
Energy Northwest
P.O. Box 968
Richland, WA 99352-0968

William A. Horin, Esq.
Winston & Strawn
1700 K Street, NW
Washington, DC 20006-3817

Matt Steuerwalt
Executive Policy Division
Office of the Governor
P.O. Box 43113
Olympia, WA 98504-3113

Lynn Albin, Radiation Physicist
Washington State Department of Health
P.O. Box 7827
Olympia, WA 98504-7827

Assistant Director
Nuclear Safety and Energy Siting Division
Oregon Department of Energy
625 Marion Street NE
Salem, OR 97301-3742

Electronic distribution by RIV:
 Regional Administrator (**BSM1**)
 DRP Director (**ATH**)
 DRS Director (**DDC**)
 DRS Deputy Director (**RJC1**)
 Senior Resident Inspector (**ZKD**)
 Branch Chief, DRP/A (**CEJ1**)
 Senior Project Engineer, DRP/E (**TRF**)
 Team Leader, DRP/TSS (**RLN1**)
 RITS Coordinator (**KEG**)

SUNSI Review Completed: __CEJ__ ADAMS: / Yes ☐ No Initials: __CEJ__
 / Publicly Available ☐ Non-Publicly Available ☐ Sensitive / Non-Sensitive

R: REACTORS\CGS\Denial Letter 2006-02RP.wpd

SPE:PBA	C:PBA	DD:DRP	EF:ACES	SRI:CGS
TRFarnholtz	CEJohnson	AVegel	MSHaire	ZKDunham
E-CEJohnson	/RA/	/RA/	/RA/	E-CEJohnson
08/16 /06	08/16/06	08/30/06	08/21/06	08/16/06
OE				
DLSolorio				
/RA/				
08/29/06		08/ /06	08/ /06	08/ /06

OFFICIAL RECORD COPY

T=Telephone

E=E-mail

F=Fax