



Alex L. Javorik  
Columbia Generating Station  
P.O. Box 988, PE04  
Richland, WA 99352-0988  
Ph. 509.377.8555 | F. 509.377.2354  
aljavorik@energy-northwest.com

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GO2-13-062

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

Subject: **COLUMBIA GENERATING STATION, DOCKET NO. 50-397  
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION  
REGARDING PROPOSED ALTERNATIVE TO USE CODE CASE N-795**

- References: 1) Letter, GO2-12-171, dated November 27, 2012, AL Javorik (Energy Northwest) to NRC, "Proposed Alternative To Utilize Code Case N-795, 'Alternative Requirements For BWR Class 1 System Leakage Test Pressure Following Repair/Replacement Activities, Section XI, Division 1'" (ADAMS Accession No. ML12340A066)
- 2) Letter dated March 14, 2013, NRC to ME Reddemann (Energy Northwest), "Columbia Generating Station – Request for Additional Information Regarding Proposed Alternative to Use Code Case N-795 (TAC No. MF0319)" (ADAMS Accession No. ML13071A322)

Dear Sir or Madam:

By Reference 1, Energy Northwest submitted a proposed alternative to utilize code case N-795. By Reference 2, the Nuclear Regulatory Commission (NRC) requested additional information related to the Energy Northwest submittal. Transmitted herewith in Attachment 1 is the Energy Northwest response to the request for additional information.

New regulatory commitments made in this submittal are identified in Attachment 2. Should you have any questions or require additional information regarding this matter, please contact Ms. L.L. Williams, Licensing Supervisor, at (509)377-8148.

Respectfully,

A.L. Javorik  
Vice President, Engineering

AB01  
NRR

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**Attachment 1 – Response to Request for Additional Information**

**Attachment 2 – List of Commitments**

**cc: NRC RIV Regional Administrator  
NRC NRR Project Manager  
NRC Senior Resident Inspector/988C  
AJ Rapacz – BPA/1399  
WA Horin – Winston & Strawn**

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Attachment 1

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**Response to Request for Additional Information**

**NRC Request:**

1. Code Case N-795 has not been accepted by the NRC staff in the latest revision to Regulatory Guide 1.147, "Inservice Inspection Code Case Acceptability, ASME Section XI, Division 1." It is the NRC staff's position that after pressurization, a hold time of 1 hour for non-insulated components and 8 hours for insulated components is required prior to conducting the required VT-2 visual examination. If the shorter hold times specified in ASME Code Case N-795 are to be used, please provide the technical basis for their use.

**Energy Northwest Response:**

Energy Northwest agrees to the NRC staff's position that after pressurization, a 1 hour hold time for non-insulated components and 8 hour hold time for insulated components is required prior to conducting the required VT-2 visual examination. The shorter hold times specified in ASME Code Case N-795 shall not be used.

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**Attachment 2**

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**List of Commitments**

The following table identifies the regulatory commitments in this document. Any other statements in this submittal regarding intended or planned actions are provided for information purposes and are not considered to be regulatory commitments.

<b>Commitment</b>	<b>Scheduled Completion Date</b>
<b>Energy Northwest commits to the following exception when utilizing Code Case N-795:</b> <ul style="list-style-type: none"><li>• After pressurization, a 1 hour hold time for non-insulated components and an 8 hour hold time for insulated components is required prior to conducting the required VT-2 examination.</li></ul>	<b>Upon NRC approval</b>