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July 7, 2015
GO2-15-088

10 CFR 50.73

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

Subject: **COLUMBIA GENERATING STATION, DOCKET NO. 50-397**
LICENSEE EVENT REPORT NO. 2015-003-00

Dear Sir or Madam:

Transmitted herewith is Licensee Event Report No. 2015-003-00 for Columbia Generating Station. This report is submitted pursuant to 10 CFR 50.73(a)(2)(i)(B).

There are no commitments being made to the NRC by this letter. If you have any questions or require additional information, please contact Mr. J.R. Trautvetter, Regulatory Compliance Supervisor, at (509) 377-4337.

Executed on June 23, 2015
Respectfully,

W. G. Hettel
Vice President, Operations

Enclosure: Licensee Event Report 2015-003-00

cc: NRC Region IV Administrator
NRC NRR Project Manager
NRC Senior Resident Inspector/988C
CD Sonoda – BPA/1399
WA Horin – Winston & Strawn

NRC FORM 366 (01-2014) U.S. NUCLEAR REGULATORY COMMISSION

LICENSEE EVENT REPORT (LER)

(See Page 2 for required number of digits/characters for each block).

1. FACILITY NAME	2. DOCKET NUMBER	3. PAGE
Columbia Generating Station	05000 397	1 OF 3

4. TITLE

Implementation of Enforcement Guidance Memorandum (EGM) 11-003, Revision 2

5. EVENT DATE			6. LER NUMBER			7. REPORT DATE			8. OTHER FACILITIES INVOLVED	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV NO.	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER 05000
05	13	2015	2015	− 003	− 00	07	07	2015	FACILITY NAME	DOCKET NUMBER 05000

9. OPERATING MODE	11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: *(Check all that apply)*			
5	☐ 20.2201(b)	☐ 20.2203(a)(3)(i)	☐ 50.73(a)(2)(i)(C)	☐ 50.73(a)(2)(vii)
	☐ 20.2201(d)	☐ 20.2203(a)(3)(ii)	☐ 50.73(a)(2)(ii)(A)	☐ 50.73(a)(2)(viii)(A)
	☐ 20.2203 (a)(1)	☐ 20.2203(a)(4)	☐ 50.73(a)(2)(ii)(B)	☐ 50.73(a)(2)(viii)(B)
	☐ 20.2203(a)(2)(i)	☐ 50.36(c)(1)(i)(A)	☐ 50.73(a)(2)(iii)	☐ 50.73(a)(2)(ix)(A)
10. POWER LEVEL	☐ 20.2203(a)(2)(ii)	☐ 50.36(c)(1)(ii)(A)	☐ 50.73(a)(2)(iv)(A)	☐ 50.73(a)(2)(x)
	☐ 20.2203(a)(2)(iii)	☐ 50.36(c)(2)	☐ 50.73(a)(2)(v)(A)	☐ 73.71(a)(4)
0%	☐ 20.2203(a)(2)(iv)	☐ 50.46(a)(3)(ii)	☐ 50.73(a)(2)(v)(B)	☐ 73.71(a)(5)
	☐ 20.2203(a)(2)(v)	☐ 50.73(a)(2)(i)(A)	☐ 50.73(a)(2)(v)(C)	☐ OTHER
	☐ 20.2203(a)(2)(vi)	☒ 50.73(a)(2)(i)(B)	☐ 50.73(a)(2)(v)(D)	Specify in Abstract below or in NRC Form 366A

12. LICENSEE CONTACT FOR THIS LER

FACILITY NAME	TELEPHONE NUMBER *(Include Area Code)*

13. COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT

CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX		CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX
N/A	N/A	N/A	N/A	N/A		N/A	N/A	N/A	N/A	N/A

14. SUPPLEMENTAL REPORT EXPECTED	15. EXPECTED SUBMISSION DATE	MONTH	DAY	YEAR
☐ YES *(If yes, complete 15. EXPECTED SUBMISSION DATE)* ☒ NO				

ABSTRACT *(Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines)*

The condition reported by this LER was an expected condition, which was the result of planned activities in support of a routine refueling outage. As described in the LER, the U.S. Nuclear Regulatory Commission (NRC) provided enforcement guidance, applicable to boiling water reactor licensees, that allows the reported condition. Although this allowance is provided by the NRC's enforcement guidance, the planned activities are still reportable in accordance with 10 CFR 50.73(a)(2)(i)(B) as a condition prohibited by Technical Specifications (TS).

Between May 13, 2015 and June 13, 2015, Columbia Generating Station (Columbia) performed Operations with the Potential for Draining the Reactor Vessel (OPDRV) activities while in Mode 5 without an operable secondary containment, as expected and allowed by NRC Enforcement Guidance Memorandum (EGM) 11-003, Revision 2. Although EGM 11-003, Revision 2, allows implementation of interim actions as an alternative to full compliance, this condition is still considered a condition prohibited by Technical Specification (TS) 3.6.4.1. The OPDRV activities were planned activities that were completed under the guidance of plant procedures and work instructions and are considered to have low safety significance based on the interim actions taken. Since these actions were deliberate, no cause determination was necessary. A license amendment request will be submitted following NRC approval of the Technical Specification Task Force (TSTF) traveler associated with generic resolution of this issue.

NARRATIVE

EVENT DESCRIPTION

While in Mode 5, Refueling, OPDRVs were performed as part of Columbia's 22nd refueling outage (R22) without an operable secondary containment. Columbia used the provisions of EGM 11-003, Revision 2 to perform the activities which are listed as follows:

5/13/2015 0222 Pacific Daylight Time (PDT) – Commenced OPDRV activity to Secure residual heat removal pump RHR-P-2B.

5/13/15 0323 PDT – started pump RHR-P-2B and exited the OPDRV activity

5/15/15 1607 PDT - Commenced Control Rod Drive (CRD) removal and replacement OPDRV activity

5/17/15 0500 PDT – Commenced local power range monitor (LPRM) incore assembly removal and installation activity

5/18/15 1212 PDT – Commenced removal/replacement of dry tube for IRM-DET-2A

5/18/15 2200 PDT – Exited OPDRV window following completion of CRD, LPRM and IRM maintenance activities

5/25/15 0425 PDT – Commenced swap of shutdown cooling from Train A to Train B OPDRV activity

5/25/15 0447 PDT – Exited OPDVR for shutdown cooling train swap activity

5/25/15 2338 PDT – Commenced leak rate testing of valves RHR-V-41C, RHR-V-41B, and RHR-V-50B OPDRV activity

5/26/15 1102 PDT – Exited OPDRV window for leak rate testing of valves RHR-V-41C, RHR-V-41B, and RHR-V-50B

6/11/15 0635 PDT – Commenced reactor recirculation pump RRC-P-1A seal replacement OPDRV

6/13/15 1205 PDT – Declared Secondary Containment operable, EGM 11-003 no longer required for use to support OPDRVs

6/14/15 0325 PDT – Exited RRC-P-1A seal replacement OPDRV

CAUSE OF THE EVENT

Implementation of EGM 11-003, Revision 2 interim actions during Columbia R22 was a planned activity. As such, no cause determination was performed on these events.

ANALYSIS / SAFETY SIGNIFICANCE

This event is reportable in accordance with 10 CFR 50.73(a)(2)(i)(B) as operations prohibited by Columbia TS 3.6.4.1, which prohibits activities identified as OPDRVS in Mode 5 while secondary containment is inoperable.

The OPDRV activities described in this report were accomplished using the interim actions provided by the NRC in EGM 11-003, Revision 2. Columbia adhered to the NRC plain language meaning of OPDRV activities that could potentially result in draining or siphoning the reactor pressure vessel water below the top of fuel. This included evolutions involving

NARRATIVE

aligning and realigning systems prior to achieving steady-state water level control, without taking credit for mitigating measures. Columbia also met the requirements which specify the minimum makeup flow rate and water inventory. Further, an adequate defense in depth was maintained to minimize the potential for the release of fission products with secondary containment inoperable. Since these measures were implemented, an adequate level of safety was provided during the OPDRV activities described in this report.

CORRECTIVE ACTIONS

Columbia will submit a license amendment request following NRC approval of the Technical Specification Task Force (TSTF) traveler associated with generic resolution of this issue within the time constraints specified in EGM 11-003, Revision 2.

PREVIOUS SIMILAR EVENTS

LER 2013-003-00, dated August 1, 2013, reported during planned refueling outage with the reactor cavity flooded up (Mode 5), leakage past a closed isolation valve associated with one hydraulic unit on the control rod drive system was observed through a drain line which was not recognized as an OPDRV. The leakage persisted for 16 hours until the maintenance activity was completed. During this period, secondary containment was inoperable. Technical Specifications require that with secondary containment inoperable during OPDRV activities, action must be initiated immediately to suspend OPDRV. Contrary to this, action was not taken to suspend OPDRV. The corrective action was to revise procedural guidance. This event could not have prevented the condition reported in LER 2015-003-00 since this event uses EGM 11-003, Revision 2 which results in a condition prohibited by Technical Specifications.