



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

June 24, 2016

Mr. Mark E. Reddemann
Chief Executive Officer
Energy Northwest
P.O. Box 968 (Mail Drop 1023)
Richland, WA 99352-0968

SUBJECT: COLUMBIA GENERATING STATION – RELIEF REQUEST FOR ALTERNATIVE
4ISI-03 FOR THE FOURTH 10-YEAR INSERVICE INSPECTION INTERVAL
(CAC NO. MF7205)

Dear Mr. Reddemann:

By letter dated December 22, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15357A274), Energy Northwest (the licensee) submitted Relief Request 4ISI-03 to request authorization to continue to use the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section XI, 2001 Edition, 2003 Addenda as the plant repair/replacement program and plant inspection procedures until January 31, 2016, for Columbia Generating Station (CGS).

Specifically, pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55a(z)(1), the licensee requested to use the proposed alternative on the basis that the alternative provides an acceptable level of quality and safety.

CGS entered the fourth 10-year inservice inspection (ISI) interval on December 13, 2015. The licensee was unable to implement a new ISI program prior to the expiration of the third 10-year interval for the fourth 10-year interval. The ISI program would only be used for inspections or repair/replacement activities conducted prior to issuance of the ISI program plan for the fourth 10-year interval. No Code repair/replacement or ISI work occurred between the licensee's submittal on December 22, 2015, and January 31, 2016.

Verbal authorization of this relief request was granted by the U.S. Nuclear Regulatory Commission (NRC) on December 23, 2015 (ADAMS Accession No. ML15357A350).

The NRC staff has reviewed the subject request and concludes, as set forth in the enclosed safety evaluation, that Energy Northwest's use of the proposed ISI program until January 31, 2016, provides an acceptable level of quality and safety, and the proposed alternative ISI program provides reasonable assurance of the leak tightness and structural integrity of the components that may be inspected. Accordingly, the NRC staff concludes that the licensee has adequately addressed all of the regulatory requirements set forth in 10 CFR 50.55a(z)(1). Therefore, the NRC authorizes the use of alternative 4ISI-03 to allow the use of the proposed ISI program at CGS until January 31, 2016.

M. Reddemann

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All other ASME Code, Section XI requirements for which relief was not specifically requested and approved remain applicable, including third-party review by the Authorized Nuclear Inservice Inspector.

If you have any questions regarding this matter, please contact the NRC Project Manager, John Klos, at (301) 415-5136 or via e-mail at John.Klos@nrc.gov.

Sincerely,

A handwritten signature in dark ink, appearing to read "R. Pascarelli", written in a cursive style.

Robert J. Pascarelli, Chief
Plant Licensing Branch IV-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-397

Enclosure:
Safety Evaluation

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

FOR THE FOURTH 10-YEAR INSERVICE INSPECTION INTERVAL

FOR RELIEF REQUEST 4ISI-03

ENERGY NORTHWEST

COLUMBIA GENERATING STATION

DOCKET NO. 50-397

1.0 INTRODUCTION

By letter dated December 22, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15357A274), Energy Northwest (the licensee) submitted Relief Request (RR) 4ISI-03 to request authorization to temporarily use the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (Code), Section XI, 2001 Edition with the 2003 Addenda for the plant repair/replacement program and plant inspection procedures until January 31, 2016, for Columbia Generating Station.

Specifically, pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55a(z)(1), the licensee requested to use the proposed alternative on the basis that the alternative provides an acceptable level of quality and safety.

Verbal authorization of this relief request was granted by the U.S. Nuclear Regulatory Commission (NRC) staff on December 23, 2015 (ADAMS Accession No. ML15357A350).

2.0 REGULATORY EVALUATION

The licensee has requested relief from the requirements of 10 CFR 50.55a(g)(5), which requires licensees to have an inservice inspection (ISI) program in place according to the requirements described in 10 CFR 50.55a(g)(4). The licensee was unable to implement a new ISI program prior to the expiration of the third 10-year ISI interval.

Paragraph 55a(z) of 10 CFR 50 states, in part, that alternatives to the requirements of 10 CFR 50.55a(b)-(h) may be used, when authorized by the Director, Office of Nuclear Reactor Regulation, if the licensee demonstrates that (1) the proposed alternative would provide an acceptable level of quality and safety or (2) compliance with the specified requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

Enclosure

Based on the above, and subject to the following technical evaluation, the NRC staff finds that regulatory authority exists for the licensee to request and the Commission to authorize the alternative requested by the licensee.

3.0 TECHNICAL EVALUATION

3.1 Licensee's Relief Request

ASME Code Components Affected

All ASME Code Class 1, 2, 3, and MC welds, components, and their supports.

Applicable Code Edition and Addenda

The applicable edition and addenda of the ASME Code, Section XI, for the fourth 10-year ISI interval is the 2007 Edition, 2008 Addenda.

Reason for Request

The licensee's refueling outage was completed in June 2015 and was the last outage of the third 10-year interval. This coincided with the preparation, adoption, and implementation of the ISI program plan for the fourth 10-year interval. The licensee was unable to issue the ISI program plan prior to entering the fourth 10-year interval. Final approvals of the revised ISI program plan using the 2007 Edition, 2008 Addenda of ASME Code, Section XI, is expected in January 2016.

Proposed Alternative

The licensee proposed to utilize the 2001 Edition with the 2003 Addenda of the ASME Code, Section XI, as approved under the third 10-year interval plan for performing emergent repair/replacement and ISI activities. ASME Code, Section XI, Appendix VIII will be implemented in accordance with 10 CFR 50.55a(b)(2)(xxiv). The licensee therefore proposed to use the 2001 Edition of the ASME Code, Section XI, for Appendix VIII, as modified by 10 CFR 50.55a.

Basis for Use

The 2001 Edition with the 2003 Addenda of the ASME Code, Section XI, is currently incorporated by reference in 10 CFR 50.55a and provides an acceptable level of quality and safety.

Duration of Proposed Alternative

Relief is requested from the date of relief approval through January 31, 2016.

3.2 NRC Staff Evaluation

Pursuant to 10 CFR 50.55a(z)(1), the licensee proposed to utilize the 2001 Edition with 2003 Addenda of the ASME Code, Section XI, as approved under the third 10-year ISI interval plan for performing emergent repair/replacement and ISI activities. The licensee also proposed to use the 2001 Edition of the ASME Code, Section XI, for Appendix VIII as modified by 10 CFR 50.55a. The licensee is requesting the use of this ISI program until January 31, 2016.

The proposed alternative corresponds to the Code edition and addenda utilized during the third 10-year ISI interval. No refueling outages or ISI inspections were conducted before January 31, 2016, and no unplanned ISI work was performed in this time period.

The 2001 Edition with 2003 Addenda of the ASME Code, using the 2001 Edition of Appendix VIII, is incorporated by reference in 10 CFR 50.55a(a)(1)(ii). Therefore, the NRC staff has determined that authorizing the alternative inspection program until January 31, 2016, provides an acceptable level of quality and safety.

4.0 CONCLUSION

As set forth above, the NRC staff has determined that the proposed alternative ISI program provides reasonable assurance of the leak tightness and structural integrity of the components that may be inspected. The NRC staff has concluded that using the proposed ISI program until January 31, 2016, provides an acceptable level of quality and safety. Accordingly, the NRC staff concludes that the licensee has adequately addressed all of the regulatory requirements set forth in 10 CFR 50.55a(z)(1). Therefore, the NRC authorizes the use of alternative Relief Request 4ISI-03 to allow the use of the proposed ISI program at the Columbia Generating Station until January 31, 2016.

All other ASME Code, Section XI requirements for which relief was not specifically requested and approved remain applicable, including third-party review by the Authorized Nuclear Inservice Inspector.

Principal Contributor: S. Cumblidge, NRR/DE/EPNB

Date: June 24, 2016.

M. Reddemann

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All other ASME Code, Section XI requirements for which relief was not specifically requested and approved remain applicable, including third-party review by the Authorized Nuclear Inservice Inspector.

If you have any questions regarding this matter, please contact the NRC Project Manager, John Klos, at (301) 415-5136 or via e-mail at John.Klos@nrc.gov.

Sincerely,

/RA/

Robert J. Pascarelli, Chief
Plant Licensing Branch IV-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-397

Enclosure:
Safety Evaluation

cc w/encl: Distribution via Listserv

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ADAMS Accession No. ML16175A460

*SE email dated

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| NAME | JKlos | JBurkhardt | DAiley | RPascarelli |
| DATE | 6/24/16 | 6/24/16 | 5/31/16 | 6/24/16 |

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