

## NRR-PMDAPEm Resource

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**From:** Watford, Margaret  
**Sent:** Thursday, October 27, 2016 2:20 PM  
**To:** rmgarcia@energy-northwest.com  
**Cc:** Klos, John  
**Subject:** Request for Additional Information, Columbia MUR LAR: Fire Protection (CAC No. MF8060)

Dear Mr. Garcia,

By letter dated June 28, 2016 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML16183A365), as supplemented by letter dated August 18, 2016 (ADAMS Accession No. ML16231A511), Energy Northwest submitted a license amendment for Columbia Generating Station. The proposed amendment would revise the operating license and technical specification to implement an increase in rated thermal power from the current licensed thermal power of 3486 megawatts thermal (MWt) to a measurement uncertainty recapture thermal power of 3544 MWt.

The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed the submittal and determined that following requests for additional information (RAIs) are needed to complete its technical review and make a regulatory finding regarding this license amendment.

Please see the formal RAIs below. A clarification call was held on October 27, 2016 to ensure your staff understood the RAIs. In the clarification call, Energy Northwest agreed to submit the response to the RAIs by Monday, November 28, 2016.

REQUEST FOR ADDITIONAL INFORMATION  
MEASUREMENT UNCERTAINTY RECAPTURE LICENSE AMENDMENT  
COLUMBIA GENERATING STATION  
ENERGY NORTHWEST  
DOCKET NO. 50-397  
(CAC NO. MF8060)

Background:

By letter dated June 28, 2016, (Agencywide Documents Access and Management System (ADAMS) Accession No. ML16183A365) as supplemented by letter dated August 18, 2016 ADAMS Accession No. ML16231A511, Energy Northwest submitted a license amendment for Columbia Generating Station. The proposed amendment would revise the operating license and technical specification to implement an increase in rated thermal power from the current licensed thermal power of 3486 megawatts thermal (MWt) to a measurement uncertainty recapture thermal power of 3544 MWt.

Fire protection: **RAI – 1**

The staff notes that Enclosure 9, of the licensee's amendment dated June 28, 2016, Agencywide Documents Access and Management, Accession ML No. 16183A365, General Electric Hitachi Report NEDO-33853, "Safety Analysis Report for Columbia Generating Station Thermal Power Optimization," Revision 0, Section 6.7, "Fire Protection," states that "...There is no change in the physical plant configuration and the potential for minor changes to combustible loading as result of TPO [Thermal Power Optimization] Uprate are addressed by controlled design changes procedures..."

The staff requests the licensee to summarize any changes to the combustible loading, however minor, and discuss the impact of these changes on the plant's compliance with the fire protection program licensing basis, Title 10 of the Code of Federal Regulations Part 50 (10 CFR 50.48), or applicable portions of 10 CFR 50, Appendix R.

Fire protection: **RAI – 2**

Some plants credit aspects of their fire protection system for other than fire protection activities, e.g, utilizing the fire water pumps and water supply as backup cooling or inventory for non-primary reactor systems.

If the Columbia Generating Station credits its fire protection system in this way, the measurement uncertainty recapture power uprate license amendment request should identify the specific situations and discuss to what extent, if any, the MUR power uprate affects these “non-fire-protection” aspects of the plant fire protection system. If the Columbia Generating Station does not take such credit, the staff requests that the licensee verify this as well. The response should discuss how any non-fire suppression use of fire protection water will impact the ability to meet the fire protection system design demands.

Thank you,

Maggie Watford

Project Manager, Plant Licensing Branch IV-I

Division of Operating Reactor Licensing

U.S. Nuclear Regulatory Commission

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**Hearing Identifier:** NRR\_PMDA  
**Email Number:** 3129

**Mail Envelope Properties** (Margaret.Watford@nrc.gov20161027141900)

**Subject:** Request for Additional Information, Columbia MUR LAR: Fire Protection (CAC No. MF8060)  
**Sent Date:** 10/27/2016 2:19:39 PM  
**Received Date:** 10/27/2016 2:19:00 PM  
**From:** Watford, Margaret

**Created By:** Margaret.Watford@nrc.gov

**Recipients:**

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Tracking Status: None

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Tracking Status: None

**Post Office:**

| <b>Files</b> | <b>Size</b> | <b>Date &amp; Time</b> |
|--------------|-------------|------------------------|
| MESSAGE      | 3984        | 10/27/2016 2:19:00 PM  |

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**Priority:** Standard  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**