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December 21, 2017
GO2-17-190

10 CFR 50.71(e)

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

Subject: **COLUMBIA GENERATING STATION, DOCKET NO. 50-397,
10 CFR 50.71 MAINTENANCE OF RECORDS
LICENSING BASIS DOCUMENT UPDATE AND BIENNIAL
COMMITMENT CHANGE REPORT**

Reference: Letter, GO2-17-191, W.G. Hettel (Energy Northwest) to NRC,
"10 CFR 50.71 Maintenance of Records Non Public Version of
the Final Safety Analysis Report (FSAR)"

Dear Sir or Madam:

In accordance with the requirements of 10 CFR 50.71(e), Energy Northwest hereby submits the following updated Columbia Generating Station (Columbia) Licensing Basis Documents:

- Final Safety Analysis Report (FSAR), Amendment 64 (publicly available)
- Technical Specification Bases (TSB), Revision 101
- Licensee Controlled Specifications (LCS), Revision 98
- Operational Quality Assurance Program Description (OQAPD), Revision 52

In addition to other changes, FSAR Amendment 64 removes some redundant information and excessive detail from the FSAR to improve its focus and clarity. In accordance with NEI 98-03, Revision 1, "Guidelines for Updating Final Safety Analysis Reports", as endorsed by Regulatory Guide 1.181, "Content of the Updated Final Safety Analysis Report in Accordance with 10 CFR 50.71(e)", a brief description of the information removed is provided in Attachment 1.

Attachment 2 contains the Columbia Generating Station 2016 – 2017 Commitment Change Report. This report is submitted pursuant to NEI 99-04, Guidelines for Managing NRC Commitment Changes.

Columbia License Basis Documents are provided in electronic format in Attachments 4 and 5. The files are in the Portable Document Format (PDF). Attachment 3 contains a listing of the individual document component filenames comprising Attachments 4 and 5. The files have been sized to meet file size limitations for electronic submittals. Additionally, the PDF files in Attachment 5 contain hyperlinks. These hyperlinks are not essential to the FSAR content and are disabled.

Consistent with Energy Northwest's past FSAR submittals, Energy Northwest is providing a publicly available version of the FSAR (Attachment 5) in which information previously considered to be "sensitive unclassified (non-safeguards) information" has been removed. A list of information removed from the FSAR submittal is contained in Attachment 6. A complete copy of the FSAR is submitted under separate cover.

There are no commitments being made by this letter; however, two existing commitments have been changed as described in Attachment 2.

If you have any questions or desire additional information pertaining to this report, please contact Ms. L.L. Williams, Licensing Supervisor, at (509)377-8148.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 21 day of December 2017.

Respectfully,

WG Hettel
Vice President, Operations



- Attachment:
1. Redundant Information and Excessive Detail Removed from the FSAR
 2. Regulatory Commitment Changes (NEI 99-04 Process)
 3. Document Components
 4. Technical Specification Bases, Revision 101
Licensee Controlled Specifications, Revision 98
Operational Quality Assurance Program Description, Revision 52
 5. Columbia Generating Station FSAR, Amendment 64, Publicly Available
 6. Information withheld from Columbia Generating Station FSAR, Amendment 64, Publicly Available (Attachment 5)

cc: NRC Region IV Administrator
NRC NRR Project Manager
NRC Sr. Resident Inspector/988C

CD Sonada– BPA/1399
WA Horin – Winston & Strawn

Redundant Information and Excessive Detail Removed from the FSAR

CHAPTER 2		
Section	Description of Change	Type
2.2.2.1	Removed expected completion time for 618-11 burial site.	Excessive detail

CHAPTER 3		
Section	Description of Change	Type
3.9.3.4.1(c)(2)(f)	Delete “There are no hydraulic snubbers installed on safety-related systems at CGS; mechanical snubbers are used exclusively.”	Excessive detail

CHAPTER 8		
Section	Description of Change	Type
8.2.1.3	Removed Main Transformer Bank rating and configuration.	Excessive detail

CHAPTER 10		
Section	Description of Change	Type
Figure 10.1-2	Delete figure	Excessive detail

CHAPTER 13		
Section	Description of Change	Type
13.1.2.2.7.1	Removed specific titles.	Excessive detail
13.1.2.2.7.2	Removed specific titles.	Excessive detail
13.1.2.2.7.3	Removed specific titles.	Excessive detail
13.1.2.2.7.4	Removed specific titles.	Excessive detail
13.1.2.2.7.5	Removed specific titles.	Excessive detail
13.2.2.1.1, 13.2.2.2, 13.2.2.3.2	Removed “The accreditation is renewed every 4 years.”	Excessive detail

Appendix F		
Section	Description of Change	Type
F.7.3	Delete ISFSI DIC numbers	Excessive detail
F.7.8.a	Delete SWP-FFP-01 subsections	Excessive detail

Regulatory Commitment Changes (NEI 99-04 Process)

This section reports changes to regulatory commitments consistent with the information pertaining to Regulatory Commitment Changes (RCC) and is included pursuant to the NEI 99-04 criteria for reporting.

From GO2-87-278 (RCC-NA)

The change in Columbia's Code of Record for the Inservice Inspection (ISI) Program from the 2001 edition to the 2008 edition of American Society Mechanical Engineers (ASME) Section XI during the 4th 10-year interval update (2015), 10 CFR 50.55a(b)(3)(v)(B) mandates that the ASME Operation and Maintenance (OM) Code now be followed for the testing and examination of snubbers.

To support the change, Snubber Surveillance requirements were removed from the Licensee Controlled Specifications (LCS) and relocated the requirements to SWP-PRG-03 "Snubber Program." The procedure ensures that the requirements of the ASME OM Code, Subsections ISTA and ISTD are met. This is done to comply with 10 CFR 50.55a(b)(3)(v)(B) which states:

Licensees must comply with the provisions for examining and testing snubbers in Subsection ISTD of the ASME OM Code and make appropriate changes to their technical specifications or licensee-controlled documents with using the 2006 Addenda and later editions and addenda of Section XI of the ASME BPV Code.

Per the ASME OM Code, the commitment to have a flowchart in the implementing procedures is not required to support the Snubber Program. The ASME Code Subsection ISTD offers two testing plans to follow, the 10% Plan and the 37 Plan. Flowcharts for the different available testing plans are provided as Non-Mandatory Appendix E in the current ASME OM Code of record (2004 Edition, 2006 addenda).

The need to commit to reproducing a flowchart specific in the implementing program document is redundant to the Code Non-Mandatory Appendix E. It does not provide an increase in the ability of a structure, system or component (SSC) to perform its intended function.

The original commitment stated:

A flow chart (Attachment 1) shows how snubber Functional Testing Shall be carried out at WNP-2. This flow chart shall be included in implementing procedures.

This commitment is deleted in its entirety.

From GO2-05-147 (RCC-AR 354706)

The original commitment required the use of the load bank installed on the DG4 trailer. This commitment was made in support of the License Amendment Request for Extension of Diesel Generator Completion Time. (GO2-05-0147). The intent of the original statement was to ensure load testing was performed using a load bank rather than installed plant equipment. The wording in the commitment was intended to describe the testability of DG4 with respect to the attached load bank.

Energy Northwest now has an alternative load bank for testing DG5 that is identical to the installed DG4 load bank. The change will allow using the alternate load bank in the event the installed load bank is unavailable. The change will allow for flexibility with respect to testing DG4 in preparation of entering a 14-day Limiting Condition for Operation (LCO) for diesel generator maintenance.

The original commitment stated:

Verification of DG-4's availability to perform its risk management function will be by periodic testing and inspections. . . . This load testing will be performed using a load bank that is part of the DG-4 mobile unit and completely independent of the plant's electrical distribution system.

Commitment description has been revised to say:

Verification of DG-4's availability to perform its risk management function will be by periodic testing and inspections. . . . This load testing will be performed using a load bank that is part of the DG-4 mobile unit, or equivalent, and completely independent of the plant's electrical distribution system.

TSB, LCS, OQAPD	
File Name	Description
Attachment 4_1	TSB
Attachment 4_2	LCS
Attachment 4_3	OQAPD
FSAR Amendment 64 Publicly Available	
Attachment 5_1 of 10.pdf	General Table of Contents & List of Effective Pages
Attachment 5_2 of 10.pdf	Chapters 1 & 2
Attachment 5_3 of 10.pdf	Chapters 3 and 3a
Attachment 5_4 of 10.pdf	Chapters 4, 5 & 6
Attachment 5_5 of 10.pdf	Chapter 7
Attachment 5_6 of 10.pdf	Chapter 8
Attachment 5_7 of 10.pdf	Chapter 9
Attachment 5_8 of 10.pdf	Chapters 10 & 11
Attachment 5_9 of 10.pdf	Chapter 12
Attachment 5_10 of 10.pdf	Chapters 13, 14, 15 16 & 17 Appendices A, B, F, I & J

INFORMATION WITHHELD FROM COLUMBIA GENERATING STATION FSAR AMENDMENT 64, PUBLICLY AVAILABLE (ATTACHMENT 5)			
Drawing or Section	Drawing or Section	Drawing or Section	Drawing or Section
Figure 1.2-1	Figure 3.2-5	Figure 3.5-36	Figure 3.6-35.1
Figure 1.2-2.1	Figure 3.2-6	Figure 3.5-37	Figure 3.6-35.2
Figure 1.2-2.2	Figure 3.2-7	Figure 3.5-38	Figure 3.6-36.1
Figure 1.2-3.1	Table 3.5-5	Figure 3.5-39	Figure 3.6-36.2
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Figure 1.2-4.2	Figure 3.5-3	Figure 3.5-43	Figure 3.6-38.1
Figure 1.2-5	Figure 3.5-4	Figure 3.5-44	Figure 3.6-38.2
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Figure 1.2-7	Figure 3.5-6	Figure 3.5-46	Figure 3.6-39.1
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Figure 1.2-12	Figure 3.5-11	Figure 3.6-2	Figure 3.6-41.1
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Figure 1.2-14	Figure 3.5-13	Figure 3.6-4	Figure 3.6-42.1
Figure 1.2-15	Figure 3.5-14	Figure 3.6-5	Figure 3.6-42.2
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Figure 1.2-17.1	Figure 3.5-16	Figure 3.6-7	Figure 3.6-43.2
Figure 1.2-17.2	Figure 3.5-17	Figure 3.6-8	Figure 3.6-44.1
Figure 1.2-18	Figure 3.5-18	Figure 3.6-9	Figure 3.6-44.2
Figure 1.2-19	Figure 3.5-19	Figure 3.6-10	Figure 3.6-45.1
Figure 1.2-20	Figure 3.5-20	Figure 3.6-11	Figure 3.6-45.2
Figure 1.2-21	Figure 3.5-21	Figure 3.6-12	Figure 3.6-46.1
Figure 1.2-22	Figure 3.5-22	Figure 3.6-13	Figure 3.6-46.2
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Figure 3.2-3	Figure 3.5-34	Figure 3.6-34.1	Figure 3.6-51.3
Figure 3.2-4	Figure 3.5-35	Figure 3.6-34.2	Figure 3.6-52.1

**INFORMATION WITHHELD FROM COLUMBIA GENERATING STATION FSAR
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Figure 3.6-52.2	Figure 3.8-11	Figure 3A.2.1-1	Figure 3A.5.1-14b
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