



Robert E. Schuetz
Columbia Generating Station
P.O. Box 968, PE23
Richland, WA 99352-0968
Ph. 509.377.2425 | F. 509.377.4150
reschuetz@energy-northwest.com

August 15, 2019
GO2-19-090

10 CFR 50.90

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

Subject: **COLUMBIA GENERATING STATION, DOCKET NO. 50-397
LICENSE AMENDMENT REQUEST TO REVISE TECHNICAL
SPECIFICATIONS TO ADOPT TSTF-563, "REVISE INSTRUMENT
TESTING DEFINITIONS TO INCORPORATE THE SURVEILLANCE
FREQUENCY CONTROL PROGRAM"**

Dear Sir or Madam:

Pursuant to 10 CFR 50.90, Energy Northwest is submitting a request for an amendment to the Technical Specifications (TS) for Columbia Generating Station (Columbia).

Energy Northwest requests adoption of TSTF-563, "Revise Instrument Testing Definitions to Incorporate the Surveillance Frequency Control Program." TSTF-563 revises the Technical Specification (TS) definitions of Channel Calibration and Channel Functional Test, which currently permit performance by any series of sequential, overlapping, or total channel steps, to allow the required frequency for testing the components or devices in each step to be determined in accordance with the TS Surveillance Frequency Control Program.

Attachment 1 provides a description and assessment of the proposed changes.
Attachment 2 provides the existing TS pages marked to show the proposed changes.
Attachment 3 provides revised (clean) TS pages.

Approval of the proposed amendment is requested one year from the date of this letter. Once approved, the amendment shall be implemented within 60 days.

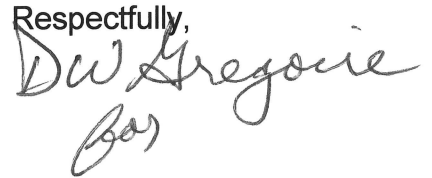
In accordance with 10 CFR 50.91, a copy of this application, with attachments, is being provided to the designated Washington State Official.

If there are any questions or if additional information is needed, please contact Mr. R. M. Garcia, Licensing Supervisor, at 509-377-8463.

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

Executed this 15th day of August, 2019.

Respectfully,

A handwritten signature in cursive script, appearing to read "R. Schuetz", with a small "for" written below it.

Robert E. Schuetz
Site Vice President

Attachments: As stated

cc: NRC RIV Regional Administrator
NRC NRR Project Manager
NRC Senior Resident Inspector/988C
CD Sonoda – BPA/1399 (email)
EFSECutc.wa.gov – EFSEC (email)
E Fordham – WDOH (email)
R Brice – WDOH (email)
WA Horin – Winston & Strawn

DESCRIPTION AND ASSESSMENT

1.0 DESCRIPTION

Energy Northwest requests adoption of TSTF-563, "Revise Instrument Testing Definitions to Incorporate the Surveillance Frequency Control Program." TSTF-563 revises the Technical Specification (TS) definitions of Channel Calibration and Channel Functional Test, which currently permit performance by any series of sequential, overlapping, or total channel steps, to allow the required frequency for testing the components or devices in each step to be determined in accordance with the TS Surveillance Frequency Control Program.

2.0 ASSESSMENT

2.1 Applicability of Safety Evaluation

Energy Northwest has reviewed the safety evaluation for TSTF-563 provided to the Technical Specifications Task Force in a letter dated December 4, 2018. This review included a review of the NRC staff's evaluation, as well as the information provided in TSTF-563. As described herein, Energy Northwest has concluded that the justifications presented in TSTF-563 and the safety evaluation prepared by the NRC staff are applicable to Columbia Generating Station (Columbia) and justify this amendment for the incorporation of the changes to the Columbia TS.

A Surveillance Frequency Control Program was incorporated into the Columbia TS in a license amendment dated November 3, 2016 (NRC Agency Documents Access and Management System (ADAMS) Accession No. ML16253A025).

2.2 Optional Changes and Variations

Energy Northwest is not proposing any variations from the TS changes described in the TSTF-563 or the applicable parts of the NRC staff's safety evaluation dated December 4, 2018.

3.0 REGULATORY ANALYSIS

3.1 No Significant Hazards Consideration Analysis

Energy Northwest requests adoption of TSTF-563, "Revise Instrument Testing Definitions to Incorporate the Surveillance Frequency Control Program." TSTF-563 revises the Technical Specification (TS) definitions of Channel Calibration and Channel Functional Test, which currently permit performance by any series of sequential, overlapping, or total channel steps, to allow the required frequency for testing the

components or devices in each step to be determined in accordance with the TS Surveillance Frequency Control Program.

Energy Northwest has evaluated whether or not a significant hazards consideration is involved with the proposed amendment(s) by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

1. Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No

The proposed change revises the TS definitions of Channel Calibration and Channel Functional Test to allow the frequency for testing the components or devices in each step to be determined in accordance with the TS Surveillance Frequency Control Program. All components in the channel continue to be calibrated. The frequency at which a channel calibration is performed is not an initiator of any accident previously evaluated, so the probability of an accident is not affected by the proposed change. The channels surveilled in accordance with the affected definitions continue to be required to be operable and the acceptance criteria of the surveillances are unchanged. As a result, any mitigating functions assumed in the accident analysis will continue to be performed.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed amendment create the possibility of a new or different kind of accident from any previously evaluated?

Response: No

The proposed change revises the TS definitions of Channel Calibration and Channel Functional Test to allow the frequency for testing the components or devices in each step to be determined in accordance with the TS Surveillance Frequency Control Program. The physical alteration of the plant (i.e., no new or different type of equipment will be installed). No credible new failure mechanisms, malfunctions, or accident initiators not considered in the design and licensing bases are introduced. The changes do not alter assumptions made in the safety analysis. The proposed changes are consistent with the safety analysis assumptions.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

3. Does the proposed amendment involve a significant reduction in a margin of safety?

Response: No

The proposed change revises the TS definitions of Channel Calibration and Channel Functional Test to allow the frequency for testing the components or devices in each step to be determined in accordance with the TS Surveillance Frequency Control Program. The Surveillance Frequency Control Program assures sufficient safety margins are maintained, and that that design, operation, surveillance methods, and acceptance criteria specified in applicable codes and standards (or alternatives approved for use by the NRC) will continue to be met as described in the plants' licensing basis. The proposed change does not adversely affect existing plant safety margins or the reliability of the equipment assumed to operate in the safety analysis. As such, there are no changes being made to safety analysis assumptions, safety limits, or limiting safety system settings that would adversely affect plant safety as a result of the proposed change. Margins of safety are unaffected by method of determining surveillance test intervals under an NRC-approved licensee-controlled program.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, Energy Northwest concludes that the proposed change presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

Conclusion

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

4.0 ENVIRONMENTAL EVALUATION

The proposed change would change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or would change an inspection or surveillance requirement. However, the proposed change does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluents that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed change meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no

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Attachment 1

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environmental impact statement or environmental assessment need be prepared in connection with the proposed change.

Attachment 2

Proposed Columbia Technical Specification Changes (Mark-Up)

1.0 USE AND APPLICATION

1.1 Definitions

-----NOTE-----

The defined terms of this section appear in capitalized type and are applicable throughout these Technical Specifications and Bases.

| <u>Term</u> | <u>Definition</u> |
|---|---|
| ACTIONS | ACTIONS shall be that part of a Specification that prescribes Required Actions to be taken under designated Conditions within specified Completion Times. |
| AVERAGE PLANAR LINEAR HEAT GENERATION RATE (APLHGR) | The APLHGR shall be applicable to a specific planar height and is equal to the sum of the LHGRs for all the fuel rods in the specified bundle at the specified height divided by the number of fuel rods in the fuel bundle at the height. |
| CHANNEL CALIBRATION | A CHANNEL CALIBRATION shall be the adjustment, as necessary, of the channel output such that it responds within the necessary range and accuracy to known values of the parameter that the channel monitors. The CHANNEL CALIBRATION shall encompass the entire channel, including the required sensor, alarm, display, and trip functions, and shall include the CHANNEL FUNCTIONAL TEST. Calibration of instrument channels with resistance temperature detector (RTD) or thermocouple sensors may consist of an in-place qualitative assessment of sensor behavior and normal calibration of the remaining adjustable devices in the channel. The CHANNEL CALIBRATION may be performed by means of any series of sequential, overlapping, or total channel steps, and each step must be performed within the Frequency in the Surveillance Frequency Control Program for the devices included in the step so that the entire channel is calibrated. |
| CHANNEL CHECK | A CHANNEL CHECK shall be the qualitative assessment, by observation, of channel behavior during operation. This determination shall include, where possible, comparison of the channel indication and status to other indications or status derived from independent instrument channels measuring the same parameter. |
| CHANNEL FUNCTIONAL TEST | A CHANNEL FUNCTIONAL TEST shall be the injection of a simulated or actual signal into the channel as close to the sensor as practicable to verify OPERABILITY, including required alarm, interlock, display, and trip functions, and channel failure trips. The CHANNEL FUNCTIONAL TEST may be performed by means of any series of sequential, |

overlapping, or total channel steps, and each step must be performed within the Frequency in the Surveillance Frequency Control Program for the devices included in the step ~~so that the entire channel is tested.~~

Attachment 3

Proposed Columbia Technical Specification Changes (Re-Typed)

1.0 USE AND APPLICATION

1.1 Definitions

-----NOTE-----

The defined terms of this section appear in capitalized type and are applicable throughout these Technical Specifications and Bases.

| <u>Term</u> | <u>Definition</u> |
|---|---|
| ACTIONS | ACTIONS shall be that part of a Specification that prescribes Required Actions to be taken under designated Conditions within specified Completion Times. |
| AVERAGE PLANAR LINEAR HEAT GENERATION RATE (APLHGR) | The APLHGR shall be applicable to a specific planar height and is equal to the sum of the LHGRs for all the fuel rods in the specified bundle at the specified height divided by the number of fuel rods in the fuel bundle at the height. |
| CHANNEL CALIBRATION | A CHANNEL CALIBRATION shall be the adjustment, as necessary, of the channel output such that it responds within the necessary range and accuracy to known values of the parameter that the channel monitors. The CHANNEL CALIBRATION shall encompass the entire channel, including the required sensor, alarm, display, and trip functions, and shall include the CHANNEL FUNCTIONAL TEST. Calibration of instrument channels with resistance temperature detector (RTD) or thermocouple sensors may consist of an in-place qualitative assessment of sensor behavior and normal calibration of the remaining adjustable devices in the channel. The CHANNEL CALIBRATION may be performed by means of any series of sequential, overlapping, or total channel steps, and each step must be performed within the Frequency in the Surveillance Frequency Control Program for the devices included in the step. |
| CHANNEL CHECK | A CHANNEL CHECK shall be the qualitative assessment, by observation, of channel behavior during operation. This determination shall include, where possible, comparison of the channel indication and status to other indications or status derived from independent instrument channels measuring the same parameter. |
| CHANNEL FUNCTIONAL TEST | A CHANNEL FUNCTIONAL TEST shall be the injection of a simulated or actual signal into the channel as close to the sensor as practicable to verify OPERABILITY, including required alarm, interlock, display, and trip functions, and channel failure trips. The CHANNEL FUNCTIONAL TEST may be performed by means of any series of sequential, |

1.1 Definitions

CHANNEL FUNCTIONAL TEST (Continued)

overlapping, or total channel steps, and each step must be performed within the Frequency in the Surveillance Frequency Control Program for the devices included in the step.

CORE ALTERATION

CORE ALTERATION shall be the movement of any fuel, sources, or reactivity control components within the reactor vessel with the vessel head removed and fuel in the vessel. The following exceptions are not considered to be CORE ALTERATIONS:

- a. Movement of source range monitors, local power range monitors, intermediate range monitors, traversing incore probes, or special movable detectors (including undervessel replacement); and
- b. Control rod movement, provided there are no fuel assemblies in the associated core cell.

Suspension of CORE ALTERATIONS shall not preclude completion of movement of a component to a safe position.

CORE OPERATING LIMITS REPORT (COLR)

The COLR is the unit specific document that provides cycle specific parameter limits for the current reload cycle. These cycle specific limits shall be determined for each reload cycle in accordance with Specification 5.6.3. Plant operation within these limits is addressed in individual Specifications.

DOSE EQUIVALENT I-131

DOSE EQUIVALENT I-131 shall be that concentration of I-131 (microcuries/gram) that alone would produce the same Total Effective Dose Equivalent (TEDE) dose as the quantity and isotopic mixture of I-131, I-132, I-133, I-134, and I-135 actually present. The dose conversion factors used for this calculation shall be those listed in Federal Guidance Report (FGR) 11, "Limiting Values of Radionuclide Intake and Air Concentration and Dose Conversion Factors for Inhalation, Submersion, and Ingestion," 1988.

DRAIN TIME

The DRAIN TIME is the time it would take for the water inventory in and above the Reactor Pressure Vessel (RPV) to drain to the top of the active fuel (TAF) seated in the RPV assuming:

- a) The water inventory above the TAF is divided by the limiting drain rate;

1.1 Definitions

- b) The limiting drain rate is the larger of the drain rate through a single penetration flow path with the highest flow rate, or the sum of the drain rates through multiple penetration flow paths susceptible to a common mode failure (e.g., seismic event, loss of normal power, single human error), for all penetration flow paths below the TAF except:
 - 1. Penetration flow paths connected to an intact closed system, or isolated by manual or automatic valves that are locked, sealed, or otherwise secured in the closed position, blank flanges, or other devices that prevent flow of reactor coolant through the penetration flow paths;
 - 2. Penetration flow paths capable of being isolated by valves that will close automatically without offsite power prior to the RPV water level being equal to the TAF when actuated by RPV water level isolation instrumentation; or
 - 3. Penetration flow paths with isolation devices that can be closed prior to the RPV water level being equal to the TAF by a dedicated operator trained in the task, who is in continuous communication with the control room, is stationed at the controls, and is capable of closing the penetration flow path isolation devices without offsite power.
- c) The penetration flow paths required to be evaluated per paragraph b) are assumed to open instantaneously and are not subsequently isolated, and no water is assumed to be subsequently added to the RPV water inventory;
- d) No additional draining events occur; and
- e) Realistic cross-sectional areas and drain rates are used.

A bounding DRAIN TIME may be used in lieu of a calculated value.

EMERGENCY CORE COOLING SYSTEM (ECCS) RESPONSE TIME

The ECCS RESPONSE TIME shall be that time interval from when the monitored parameter exceeds its ECCS initiation setpoint at the channel sensor until the ECCS equipment is capable of performing its safety function (i.e., the valves travel to their required positions, pump discharge pressures reach their required values, etc.). Times shall include diesel generator starting and sequence loading delays, where

1.1 Definitions

applicable. The response time may be measured by means of any series of sequential, overlapping, or total steps so that the entire response time is measured.

END OF CYCLE RECIRCULATION PUMP TRIP (EOC-RPT) SYSTEM RESPONSE TIME

The EOC-RPT SYSTEM RESPONSE TIME shall be that time interval from initial signal generation by the associated turbine throttle valve limit switch or from when the turbine governor valve hydraulic control oil pressure drops below the pressure switch setpoint to complete suppression of the electric arc between the fully open contacts of the recirculation pump circuit breaker. The response time may be measured by means of any series of sequential, overlapping, or total steps so that the entire response time is measured.

INSERVICE TESTING PROGRAM

The INSERVICE TESTING PROGRAM is the licensee program that fulfills the requirements of 10 CFR 50.55a(f).

ISOLATION SYSTEM RESPONSE TIME

The ISOLATION SYSTEM RESPONSE TIME shall be that time interval from when the monitored parameter exceeds its isolation initiation setpoint at the channel sensor until the isolation valves travel to their required positions. The response time may be measured by means of any series of sequential, overlapping, or total steps so that the entire response time is measured.

LEAKAGE

LEAKAGE shall be:

a. Identified LEAKAGE

1. LEAKAGE into the drywell such as that from pump seals or valve packing, that is captured and conducted to a sump or collecting tank; or
2. LEAKAGE into the drywell atmosphere from sources that are both specifically located and known either not to interfere with the operation of leakage detection systems or not to be pressure boundary LEAKAGE;

b. Unidentified LEAKAGE

All LEAKAGE into the drywell that is not identified LEAKAGE;

c. Total LEAKAGE

Sum of the identified and unidentified LEAKAGE; and

1.1 Definitions

| | |
|-------------------------------------|--|
| | <p>d. <u>Pressure Boundary LEAKAGE</u></p> <p>LEAKAGE through a nonisolable fault in a Reactor Coolant System (RCS) component body, pipe wall, or vessel wall.</p> |
| LINEAR HEAT GENERATION RATE (LHGR) | The LHGR shall be the heat generation rate per unit length of fuel rod. It is the integral of the heat flux over the heat transfer area associated with the unit length. |
| LOGIC SYSTEM FUNCTIONAL TEST | A LOGIC SYSTEM FUNCTIONAL TEST shall be a test of all required logic components (i.e., all required relays and contacts, trip units, solid state logic elements, etc.) of a logic circuit, from as close to the sensor as practicable up to, but not including, the actuated device, to verify OPERABILITY. The LOGIC SYSTEM FUNCTIONAL TEST may be performed by means of any series of sequential, overlapping, or total system steps so that the entire logic system is tested. |
| MINIMUM CRITICAL POWER RATIO (MCPR) | The MCPR shall be the smallest critical power ratio (CPR) that exists in the core for each class of fuel. The CPR is that power in the assembly that is calculated by application of the appropriate correlation(s) to cause some point in the assembly to experience boiling transition, divided by the actual assembly operating power. |
| MODE | A MODE shall correspond to any one inclusive combination of mode switch position, average reactor coolant temperature, and reactor vessel head closure bolt tensioning specified in Table 1.1-1 with fuel in the reactor vessel. |
| OPERABLE - OPERABILITY | A system, subsystem, division, component, or device shall be OPERABLE or have OPERABILITY when it is capable of performing its specified safety function(s) and when all necessary attendant instrumentation, controls, normal or emergency electrical power, cooling and seal water, lubrication, and other auxiliary equipment that are required for the system, subsystem, division, component, or device to perform its specified safety function(s) are also capable of performing their related support function(s). |
| PHYSICS TESTS | <p>PHYSICS TESTS shall be those tests performed to measure the fundamental nuclear characteristics of the reactor core and related instrumentation. These tests are:</p> <p>a. Described in Chapter 14, Initial Test Program of the FSAR;</p> |

1.1 Definitions

PHYSICS TESTS (continued)

- b. Authorized under the provisions of 10 CFR 50.59; or
- c. Otherwise approved by the Nuclear Regulatory Commission.

RATED THERMAL POWER (RTP)

RTP shall be a total reactor core heat transfer rate to the reactor coolant of 3544 MWt.

REACTOR PROTECTION SYSTEM (RPS) RESPONSE TIME

The RPS RESPONSE TIME shall be that time interval from when the monitored parameter exceeds its RPS trip setpoint at the channel sensor until de-energization of the scram pilot valve solenoids. The response time may be measured by means of any series of sequential, overlapping, or total steps so that the entire response time is measured.

SHUTDOWN MARGIN (SDM)

SDM shall be the amount of reactivity by which the reactor is subcritical or would be subcritical throughout the operating cycle assuming that:

- a. The reactor is xenon free;
- b. The moderator temperature is $\geq 68^{\circ}\text{F}$, corresponding to the most reactive state; and
- c. All control rods are fully inserted except for the single control rod of highest reactivity worth, which is assumed to be fully withdrawn. With control rods not capable of being fully inserted, the reactivity worth of these control rods must be accounted for in the determination of SDM.

STAGGERED TEST BASIS

A STAGGERED TEST BASIS shall consist of the testing of one of the systems, subsystems, channels, or other designated components during the interval specified by the Surveillance Frequency, so that all systems, subsystems, channels, or other designated components are tested during n Surveillance Frequency intervals, where n is the total number of systems, subsystems, channels, or other designated components in the associated function.

THERMAL POWER

THERMAL POWER shall be the total reactor core heat transfer rate to the reactor coolant.