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August 20, 2019

GO2-19-124

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  
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION  
RELATED TO EXIGENT LICENSE AMENDMENT REQUEST FOR  
CHANGE TO TECHNICAL SPECIFICATION 3.8.7 DISTRIBUTION  
SYSTEMS – OPERATING**

- References:
1. Letter from R.E. Schuetz, Energy Northwest to NRC, Exigent License Amendment Request for Change to Technical Specification 3.8.7 Distribution Systems – Operating, dated August 15, 2019 (ADAMS Accession Number ML19227A370)
  2. Letter from R.E. Schuetz, Energy Northwest to NRC, Supplemental Information Related to Exigent License Amendment Request for Change to Technical Specification 3.8.7 Distribution Systems-Operating, dated August 16, 2019 (ADAMS Accession Number ML19228A291)
  3. Letter from R. E. Energy Northwest to NRC, Supplemental Information Related to Exigent License Amendment Request for Change to Technical Specification 3.8.7 Distribution Systems-Operating, dated August 19, 2019 (ADAMS Accession Number ML19231A387)
  4. Email from J. Klos, NRC to R. M. Garcia, Energy Northwest, dated August 20, 2019, RE: Formal release of RAIs Ref: Columbia exigent amendment - one electrical RAI, (EPID NO. L-2019-LLA-0174)

Dear Sir or Madam:

By Reference 1 Energy Northwest submitted an exigent License Amendment Request (LAR) for a change to Technical Specification (TS) 3.8.7 Distribution Systems – Operating. Based on conversations with the NRC staff, Reference 1 was supplemented with References 2 and 3. By Reference 4, the NRC issued a Request for Additional Information. The enclosure to this letter contains the requested information.

The No Significant Hazards Consideration Determination (NSHCD) provided in the original submittal is not altered by this submittal. No new commitments are being made by this letter or the enclosure.

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 20 day of August, 2019.

Respectfully,

 *For  
Bob Schuetz*

R.E. Schuetz  
Site Vice President

Enclosure: As stated

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

## **RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION**

### **NRC REQUEST No. 1:**

By application dated August 15, 2019 and its supplements dated August 16, and 19, 2019 (Agencywide Documents Access and Management System (ADAMS) Accession numbers ML19227A370, ML19228A291 and ML19231A387 respectively), Energy Northwest (the licensee) requested a license amendment to revise the Columbia Generating Station (Columbia) Technical Specification (TS) 3.8.7 Distribution Systems – Operating. This license amendment request (LAR) would add a one-time extension of the Completion Time of TS Action 3.8.7.A, specifically associated with Division 1 Alternating Current (AC) electrical power distribution inoperability.

The U.S. Nuclear Regulatory Commission (NRC) staff has determined that the following additional information is needed to complete its review.

### **Regulatory Requirement**

Title 10 of the Code of Federal Regulations (10 CFR), Section 50.36, “Technical specifications,” establishes the requirements related to the content of the TS. Pursuant to 10 CFR 50.36(c) TS are required to include items in five specific categories related to station operation: (1) Safety limits, limiting safety system settings, and limiting control settings, (2) Limited conditions of operation (LCOs), (3) Surveillance requirements (SR), (4) Design features; and (5) Administrative controls. The proposed change in this LAR relates to the LCO category.

### **Background**

In the LAR, Enclosure 1, Page 3, the licensee stated: Power panel E-PP-7AF voltage is monitored weekly through surveillance test procedures. On July 25, 2019 during the weekly surveillance it was first noted that voltage was less than the administrative limit but above the minimum allowable [acceptable]. However, it is not clear what the minimum allowable [acceptable] and the administrative limit voltage values are.

### **Request for Additional Information (RAI) No. 1**

Please provide the minimum acceptable and administrative limit voltage values, and the basis of the minimum acceptable value. Also provide the voltage values observed at Power Panel E-PP-7AF of Division 1 and Power Panel E-PP-8AF of Division 2, during last three surveillances, to determine no common cause effect exists.

**ENERGY NORTHWEST RESPONSE TO RAI 1:**

The minimum allowable voltage for Columbia Generating Station (Columbia) 120 Volt Power Panels is 114.0. This value is based on American National Standards Institute (ANSI) Standard C84.1-1995, Electrical Power Systems and Equipment – Voltage Ratings, 60 Hz. This minimum value ensures appropriate voltage is supplied to the equipment on a specific circuit.

The administrative limit voltage values used for Power Panels E-PP-7AF and E-PP-8AF phase A-G is 119.0 and 117.0 for phase B-G. Table 1 provides the voltage values observed on Power Panels E-PP-7AF and E-PP-8AF. Highlighted values fall below the administrative limit set for the Power Panel voltage.

Date	E-PP-7AF Phase A-G*	E-PP-7AF Phase B-G*	E-PP-8AF Phase A-G*	E-PP-8AF Phase B-G*
July 25, 2019	118.9	118.7	120.7	120.8
August 2, 2019	118.89	118.73	120.89	121.25
August 9, 2019	118.6	118.5	121.0	120.6
August 16, 2019	118.7	118.6	121.3	120.9

**Table 1**

\*Note: G is ground

As shown in Table 1, the voltages observed on E-PP-8AF are all well above the administrative limit. The readings above do not support a common cause effect.