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April 22, 2020
GO2-20-070

10 CFR 50.46(a)(3)(ii)

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

Subject: **COLUMBIA GENERATING STATION, DOCKET NO. 50-397
REPORT OF CHANGES OR ERRORS IN EMERGENCY CORE COOLING
SYSTEM LOSS OF COOLANT ACCIDENT ANALYSIS MODELS
PURSUANT TO 10 CFR 50.46**

Dear Sir or Madam:

This report is provided in accordance with 10 CFR 50.46(a)(3)(ii), which requires, in part, annual reporting of changes to, or errors in, evaluation models used for calculating Emergency Core Cooling System (ECCS) performance, and an estimate of their effect on the limiting ECCS analysis.

The attached report provides the details related to changes affecting the analysis of record for this reporting period. The licensing basis Peak Clad Temperature for all fuel types in the core remains within the acceptance criteria set forth in 10 CFR 50.46 (i.e., ≤ 2200 °F).

There are no commitments being made to the Nuclear Regulatory Commission herein. If you have any questions, or require additional information, please contact Ms. D.M. Wolfram, Manager Regulatory Affairs, at (509) 377-4792.

Executed on this 22nd day of April, 2020.

Respectfully,

DocuSigned by:

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J. Kent Dittmer
Vice President, Engineering

Attachment: Loss of Coolant Accident Margin Summary Sheet – Annual Report for 2019

cc: NRC Region IV Administrator
NRC NRR Project Manager
NRC Senior Resident Inspector
CD Sonoda – BPA

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Attachment

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Loss of Coolant Accident Margin Summary Sheet - Annual Report for 2019
(Per NFM-4-1 Table 7-b)

Plant Name: Columbia Generating Station				
Utility Name: Energy Northwest				
Evaluation Model: (Description or Name) GE14: SAFER/GESTR-LOCA Models, GNF-2: SAFER/PRIME-LOCA Models				
			Net PCT Effect	Absolute PCT Effect
A.	GE14 Fuel – Prior 10 CFR 50.46 Changes or Error Corrections – This Year			
	The GE14 fuel was discharged from CGS core in May of 2019. There are no changes or errors to report through May 2019. No other reporting will be provided for this fuel (GE14) going forward.			
B.	GNF2 Fuel - Prior 10 CFR 50.46 Changes or Error Corrections - This Year			
	GEH – NL 2019-05 SAFER Lower Limit on Differential Pressure for Bypass Leakage	$\Delta PCT =$	0 °F	0 °F
	GNF2 Fuel -Absolute Sum of 10 CFR 50.46 Changes	$\Delta PCT =$		0 °F

The sum of the PCT (Peak Cladding Temperature) from the most recent analysis using an acceptable evaluation model and the estimates of PCT impact for changes and errors identified since this analysis is less than 2200 °F. PCT prior to this report was 1730 °F for GE14 Fuel and 1700 °F for GNF2 fuel. The current PCT for this report is unchanged for both GE14 and GNF2.

References:

1. NE-02-03-08 Revision 6, "10CFR50.46 Cumulative PCT – Changes in ECCS LOCA Models"
2. AR 402298, "10 CFR 50.46 (ECCS) Annual reporting requirements (187662)"
3. NFM-4-1 Revision 3, "Tracking Changes in ECCS LOCA Analysis"