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April 23, 2020
GO2-20-071

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 ONE-
TIME CHANGE TO COMPLETION TIMES FOR INOPERABLE
ELECTRICAL DISTRIBUTION SYSTEMS**

- References:
1. Letter from R.E. Schuetz (Energy Northwest) to NRC, "Exigent License Amendment Request for One-Time Change to Completion Times for Inoperable Electrical Distribution Systems," dated April 15, 2020 (ADAMS Accession Number ML20107G972)
 2. Email from John Klos (NRC) to Rick Garcia (Energy Northwest), "Official release of NRC RAIs for Columbia COVID exigent due Friday April 24, 2020," dated April 21, 2020

Dear Sir or Madam:

By Reference 1 Energy Northwest submitted an exigent license amendment request for a one-time change to the completion times for Columbia Generating Station Technical Specification required actions 3.8.4.G.1, 3.8.7.A.1 and 3.8.7.B.1. By Reference 2 the Nuclear Regulatory Commission (NRC) requested additional information related to the Energy Northwest submittal. The enclosure to this letter contains the requested information.

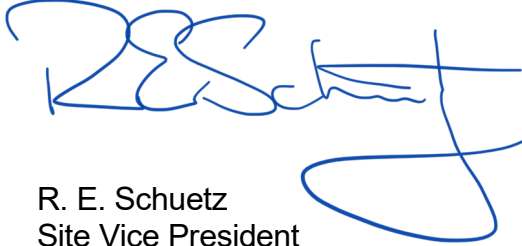
Energy Northwest further clarifies in the commitment attached to Reference 1, the reference to Section 3.2.3.4 should be Section 3.3.

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 23 day of April 2020.

Respectfully,



R. E. Schuetz
Site Vice President

Enclosure: As stated

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

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION (RAI)

NRC REQUEST RAI:

By letter dated April 15, 2020 (Agencywide Documents Access management System (ADAMS) Accession No ML20107G972), Energy Northwest (the licensee) requested an exigent amendment to Operating License NPF-21 of Columbia Generating Station (Columbia). The proposed amendment would revise the Technical Specification (TS) 3.8.4 DC (Direct Current) Sources – Operating and TS 3.8.7 Distribution Systems – Operating. This request adds a one-time extension for TS Required Actions 3.8.4.G.1, 3.8.7.A.1, and 3.8.7.B.1 completion time, specifically associated with Division 2 4160 V AC (Alternating Current) and 125 V DC electrical power distribution inoperability.

The following request for additional information is needed to complete the NRC's review of the Columbia exigent license amendment request (LAR).

Regulatory Requirements:

General Design Criterion (GDC) 17, "Electric power systems," of Appendix A, "General Design Criteria for Nuclear Power Plants," to Title 10 of the Code of Federal Regulations (10 CFR) Part 50, states in part that an onsite electric power system and an offsite electric power system shall be provided to permit functioning of structures, systems, and components important to safety. The safety function for each system (assuming the other system is not functioning) shall be to provide sufficient capacity and capability to assure that (1) specified acceptable fuel design limits and design conditions of the reactor coolant pressure boundary are not exceeded as a result of anticipated operational occurrences and (2) the core is cooled and containment integrity and other vital functions are maintained in the event of postulated accidents.

GDC 18, "Inspection and Testing of Electric Power Systems," requires that electric power systems that are important to safety must be designed to permit appropriate periodic inspection and testing.

RAI

In the third paragraph of Section 2.4.1 of the LAR, the licensee stated that a bucket could be changed in approximately 12 hours including the following approximate tasks and durations, 2 hours to verify job conditions and establish clearance order control, 6 hours for the actual electrical work, 2 hours of job closeout and removal of clearances and 2 hours of post modification testing. However, in the first paragraph of Section 2.4.1, the licensee stated that it will take approximately 2 hours to replace the bucket and the starter coil. Please explain the discrepancy.

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Enclosure

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ENERGY NORTHWEST RESPONSE TO RAI:

The last sentence of the first paragraph in Section 2.4.1 of the LAR was meant to explain that the bucket replacement of approximately 12 hours bounds the 2-hour starter coil (WMA-42-8F1E) replacement activity.