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SOLUTIONS

# Energy Northwest's LAR to Remove License Conditions 2.C.(34) and (35)

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# Participants

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# Reason for the Requested Change

**NRR Office Instruction LIC-105, Revision 7, states that commitments incorporated as part of the UFSAR (FSAR for Columbia) are managed in accordance with 10 CFR 50.59.**

- All of Energy Northwest's License Renewal Commitments for Columbia have been incorporated into the Columbia FSAR.
- Statement 1.J of the Columbia renewed facility operating license (RFOL) requires the functionality of structures and components that have been identified to require review under 10 CFR 54.21 (a)(1) be maintained and time-limited aging analyses that have been identified to require review under 10 CFR 54.21 (c) be performed.
- License Conditions 2.C.(34) and (35) are not needed to support RFOL statement 1.J.
- Clarify (by removal of language in the operating license conditions tied to specific commitments) that license renewal commitment changes apply 10 CFR 50.59 as the governing regulatory change process.

# Licensee Actions Supporting the Request

**Table A-1 from NUREG-2123, which lists the License Renewal (LR) commitments, has been added to Appendix A of the Columbia Final Safety Analysis Report.**

- The table was incorporated except for the following commitments which are not Aging Management Programs or Time-Limited Aging Analyses required by 10 CFR 54.21 (a)(1) or 10 CFR 54.21 (c).
  - Commitment 55, Incorporate FSAR Supplement - Is a one-time action completed by letter GO2-13-14 dated December 31, 2013.
  - Commitment 57, License Renewal Commitment List – Is a one-time action.
  - Commitment 56, Operational Quality Assurance Program Description – Changes are controlled by 10 CFR 50.54
- Commitment 71, Core Plate Wedges, was also removed from the table as the installation of core plate wedges is required by License Condition 2.C.(36).
- The addition of this table provides additional information to consider before making changes pursuant to the criteria set forth in 10 CFR 50.59.
- ❖ License Condition 2.C.(36) is not affected by this request.

# Justification

## The removal of License Condition 2.C.(34) and (35) is justified because RFOL 1.J Remains Unchanged

### 1. Renewed Facility Operating License No. NFP-21 1.J states:

*Actions have been identified and have been or will be taken with respect to (1) managing the effects of aging during the period of extended operation on the functionality of structures and components that have been identified to require review under 10 CFR 54.21 (a)(1), and (2) time-limited aging analyses that have been identified to require review under 10 CFR 54.21 (c), such that there is reasonable assurance that the activities authorized by the renewed operating license will continue to be conducted in accordance with the current licensing basis, as defined in 10 CFR 54.3, for the facility, and that any changes made to the facility's current licensing basis in order to comply with 10 CFR 54.29(a) are in accordance with the Act and the Commission's regulations.*

This statement requires the programs and activities that support Columbia's operation beyond the end of the original facility license must be in-place prior to entering the period of extended operation (PEO).

# Justification

**The removal of License Condition 2.C.(24) and (35) is additionally justified by the following:**

2. NUREG-2123 Table A-1 has been incorporated into the Columbia FSAR
  - Any changes to the Columbia FSAR requires application of the criteria set forth in 10 CFR 50.59 and the requirements of that section and the guidance of NEI 98-03 “Guidelines for Updating Final Safety Analysis Reports,” Revision 1, June 1999.
- ❖ License Condition 2.C.(36) is not affected by this request.

# Previous NRC Determinations

- Vermont Yankee April 17, 2013 “Issuance of Amendment to Renewed Facility Operating License RE: License Condition 3.P and 3.Q Changes”
  - “The NRC staff finds that deletion of RFOLC 3.Q is acceptable. The commitments listed in Appendix A of Supplement 2 to NUREG-1907 have either been implemented and/or completed as documented in: (1) IR 05000271/2011011 (ADAMS Accession No. ML 113560064) and IR 05000271/2012008 (ADAMS Accession No. ML 12103A406) or (2) licensee correspondence submitted on November 20, 2012, under oath and affirmation. The commitments addressing license renewal activities to be completed prior to and/or during the period of extended operation have been incorporated in the UFSAR to be managed by 10 CFR 50.59 and will be governed by RFOLC 3.P. Additionally, the licensee has entered the period of extended operation. Therefore, the NRC staff concludes that RFOLC 3.Q is no longer needed and RFOLC 3.Q can be deleted.”

# Previous NRC Determinations

- Cooper Station September 12, 2013, “Issuance of Amendment RE: Modification of Renewed Operating License Condition 2.E”
  - “Per the licensee's request in this LAR, the NRC staff concludes that it is acceptable to incorporate the actions in the commitments as part of the USAR for the reasons described in Section 3.2 of this SE, rather than treating the commitments referenced in license condition 2.F as license conditions. Therefore, the commitments can be listed in license condition 2.E.” ...“Until these respective updates are complete, the licensee may not make changes to the information in the supplement, or the above commitments. Following incorporation of the supplement and commitments into the USAR, the need for Commission approval of any changes will be governed by 10 CFR 50.59.”



# Submittal Schedule/Timing of Request

- The request is expected to be submitted by the first week of May.
- Energy Northwest has started the planning of the license renewal inspections that are required to be completed by June 20, 2023 and requests that the NRC shorten the normal turnaround time to allow as many scheduling improvements as possible to be made before refueling outage 26 is finalized.