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December 15, 2021

10 CFR 50.71(e)

GO2-21-131

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

Subject: **COLUMBIA GENERATING STATION, DOCKET NO. 50-397,
10 CFR 50.71 MAINTENANCE OF RECORDS
LICENSING BASIS DOCUMENT UPDATE AND BIENNIAL
COMMITMENT CHANGE REPORT**

Reference: Letter, GO2-21-132, R.E. Schuetz (Energy Northwest) to NRC,
"10 CFR 50.71 Maintenance of Records – Non-Public Version of
the Final Safety Analysis Report"

Dear Sir or Madam:

In accordance with the requirements of 10 CFR 50.71(e), Energy Northwest hereby submits the following updated Columbia Generating Station (Columbia) Licensing Basis Documents:

- Final Safety Analysis Report (FSAR), Amendment 66 (Publicly Available)
- Licensee Controlled Specifications (LCS), Revision 122
- Technical Specification Bases (TSB), Revision 124
- Operational Quality Assurance Program Description (OQAPD), Revision 57.

In addition to other changes, FSAR Amendment 66 removes some redundant information and excessive detail from the FSAR to improve its focus and clarity. In accordance with Nuclear Energy Institute (NEI) NEI 98-03, Revision 1, "Guidelines for Updating Final Safety Analysis Reports," as endorsed by Regulatory Guide 1.181, "Content of the Updated Final Safety Analysis Report in Accordance with 10 CFR 50.71(e)," a brief description of the information removed is provided in Attachment 1.

GO2-21-131

Page 2 of 3

Attachment 2 contains the Columbia Generating Station 2020-2021 Commitment Change Report. This report is submitted pursuant to NEI 99-04, "Guidelines for Managing NRC Commitment Changes."

Columbia License Basis Documents are provided in electronic format in Attachments 4 and 5. The files are in the Portable Document Format (PDF). Attachment 3 contains a listing of the individual document component file names comprising Attachments 4 and 5. The files have been sized to meet file size limitations for electronic submittals. Additionally, the PDF files in Attachment 5 contain hyperlinks. These hyperlinks are not essential to the FSAR content and are disabled.

Energy Northwest has performed its biennial review of plant changes in accordance with 10 CFR 54.37(b) to determine whether there are any "newly identified structures, systems or component (SSC)" that require aging management or there are any time limited aging analyses (TLAA) that require re-evaluation. There were no SSCs that met the definition of "newly identified." There were no new materials or environments identified. There were also no time limited aging analyses that required re-evaluation.

Consistent with Energy Northwest's past FSAR submittals, Energy Northwest is providing a publicly available version of the FSAR (Attachment 5) in which information previously considered to be "sensitive unclassified (non-safeguards) information" has been removed. A list of information removed from the FSAR submittal is contained in Attachment 6. A complete copy of the FSAR is submitted under separate cover.

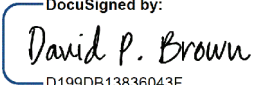
There are no commitments being made by this letter; however, one existing commitment has been changed as described in Attachment 2.

If you have any questions or desire additional information pertaining to this report, 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 on the 15th day of December 2021.

Respectfully,

DocuSigned by:

D199DB13836043F...
David P. Brown
Site Vice President

GO2-21-131

Page 3 of 3

- Attachments:
1. Redundant Information and Excessive Detail Removed from the FSAR
 2. Regulatory Commitment Changes (NEI 99-04 Process)
 3. Document Components
 4. Licensee Controlled Specifications, Revision 122
Technical Specification Bases, Revision 124
Operational Quality Assurance Program Description, Revision 57
 5. Columbia Generating Station FSAR, Amendment 66, Publicly Available
 6. Information Withheld from Columbia Generating Station FSAR, Amendment 66, Publicly Available (Attachment 5)

cc: NRC Region IV Administrator
NRC NRR Project Manager
NRC Sr. Resident Inspector/988C
CD Sonoda– BPA/1399

GO2-21-131

Attachment 1

Page 1 of 2

Redundant Information and Excessive Detail Removed from the FSAR

CHAPTER 3		
Section	Description of Change	Type
Table 3.5-2	Delete RRA-FN-16 from table	Obsolete information
Table 3.6-6	Remove subscript	Redundant Information
Table 3.9.2c	Delete table	Excessive Detail

CHAPTER 4		
Section	Description of Change	Type
4.3.2.1	Delete reference 4.3-9	Obsolete information
Table 4.4-1	Replace GE14 reactor core thermal hydraulic design description with GNF2	Obsolete information
Table 4.4-2	Delete table and replace with reference	Obsolete information
4.5.1.5	Removed marked up humidity detector statement	Obsolete information

CHAPTER 6		
Section	Description of Change	Type
6.3.3, 6.3.6, Table 6.3-2b, Table 6.3-4a, Table 6.3-4b	Delete GE14 ECCS performance evaluation	Obsolete information

CHAPTER 8		
Section	Description of Change	Type
8.3.1.1.7.2.1	Delete last two sentences in paragraph prior to 8.3.1.1.7.2.2 which is a discussion on the configuration of cross connect breaker	Excessive detail

CHAPTER 9		
Section	Description of Change	Type
9.5.3.1 c	Remove "only incandescent sources are used inside primary containment."	Obsolete information

CHAPTER 15		
Section	Description of Change	Type
15.4.2.3.3	Delete reference to GE14 results	Obsolete information

GO2-21-131

Attachment 1

Page 2 of 2

Appendix A		
Section	Description of Change	Type
A.2.1.25 and A.3.1.26	Removed statement at end of each section stating “NFPA recommendations” and replaced with “Section F.2.7.”	Obsolete Information

Appendix F		
Section	Description of Change	Type
F.4.3.a through F.4.3.f	Delete valve listing	Obsolete information
F.7.5.p	Deleted reference to Spec 300-306	Obsolete information
F.7.8.e	Removed word Transient from procedure title	Obsolete information

GO2-21-131

Attachment 2

Page 1 of 1

Regulatory Commitment Changes (NEI 99-04 Process)

This section reports changes to regulatory commitments consistent with the information pertaining to Regulatory Commitment Changes (RCC) and is included pursuant to the NEI 99-04 criteria for reporting.

The License Renewal commitment to prepare and submit the Inservice Inspection (ISI) Program was revised to accurately reflect the approved interval dates, as well as the date the program plan was submitted to the NRC. The NRC verbally approved a temporary extension of the third 10-year interval of the ISI Program but the extension was not changed in the FSAR or the Commitment Tracking Log at the time.

The original commitment stated:

Columbia will prepare and submit the ISI Program Plan for the fourth 10-year interval no later than 2015. (The third 10-year ISI interval extends from December 2005 until December 2015.) The Small Bore Piping Program will be included in the fourth 10-year interval ISI Program Plan as an augmented inspection. The locations to be inspected, the sample size, the inspection methodology will be included in the program plan.

Commitment description has been revised to say:

The third 10-year ISI interval was approved by the NRC for extension to January 31, 2016. The fourth 10-year interval ISI Program Plan was issued on January 27, 2016 and was submitted to the NRC on May 8, 2017. The Small Bore Piping Program will be included in the fourth 10-year interval ISI Program Plan as an augmented inspection. The locations to be inspected, the sample size, the inspection methodology will be included in the program plan.

GO2-21-131

Attachment 3

Page 1 of 1

Document Components

TSB, LCS, OQAPD	
File Name	Description
Attachment 4_1.pdf	LCS
Attachment 4_2.pdf	TSB
Attachment 4_3.pdf	OQAPD
FSAR Amendment 66, Publicly Available	
Attachment 5_1 of 10.pdf	General Table of Contents & List of Effective Pages
Attachment 5_2 of 10.pdf	Chapters 1 & 2
Attachment 5_3 of 10.pdf	Chapters 3 and 3a
Attachment 5_4 of 10.pdf	Chapters 4, 5 & 6
Attachment 5_5 of 10.pdf	Chapter 7
Attachment 5_6 of 10.pdf	Chapter 8
Attachment 5_7 of 10.pdf	Chapter 9
Attachment 5_8 of 10.pdf	Chapters 10 & 11
Attachment 5_9 of 10.pdf	Chapter 12
Attachment 5_10 of 10.pdf	Chapters 13, 14, 15, 16 & 17 Appendices A, B, F, I & J

GO2-21-131

Attachment 6

Page 1 of 3

Information Withheld From Columbia Generating Station FSAR Amendment 66, Publicly Available (Attachment 5)			
Figure	Figure/Table	Figure	Figure
Figure 1.2-1	Figure 3.2-5	Figure 3.5-36	Figure 3.6-35.1
Figure 1.2-2.1	Figure 3.2-6	Figure 3.5-37	Figure 3.6-35.2
Figure 1.2-2.2	Figure 3.2-7	Figure 3.5-38	Figure 3.6-36.1
Figure 1.2-3.1	Table 3.5-5	Figure 3.5-39	Figure 3.6-36.2
Figure 1.2-3.2	Figure 3.5-1	Figure 3.5-41	Figure 3.6-37.1
Figure 1.2-4.1	Figure 3.5-2	Figure 3.5-42	Figure 3.6-37.2
Figure 1.2-4.2	Figure 3.5-3	Figure 3.5-43	Figure 3.6-38.1
Figure 1.2-5	Figure 3.5-4	Figure 3.5-44	Figure 3.6-38.2
Figure 1.2-6	Figure 3.5-5	Figure 3.5-45	Figure 3.6-38.3
Figure 1.2-7	Figure 3.5-6	Figure 3.5-46	Figure 3.6-39.1
Figure 1.2-8	Figure 3.5-7	Figure 3.5-47	Figure 3.6-39.2
Figure 1.2-9	Figure 3.5-8	Figure 3.5-49	Figure 3.6-39.3
Figure 1.2-10	Figure 3.5-9	Figure 3.5-50	Figure 3.6-40.1
Figure 1.2-11	Figure 3.5-10	Figure 3.6-1	Figure 3.6-40.2
Figure 1.2-12	Figure 3.5-11	Figure 3.6-2	Figure 3.6-41.1
Figure 1.2-13	Figure 3.5-12	Figure 3.6-3	Figure 3.6-41.2
Figure 1.2-14	Figure 3.5-13	Figure 3.6-4	Figure 3.6-42.1
Figure 1.2-15	Figure 3.5-14	Figure 3.6-5	Figure 3.6-42.2
Figure 1.2-16	Figure 3.5-15	Figure 3.6-6	Figure 3.6-43.1
Figure 1.2-17.1	Figure 3.5-16	Figure 3.6-7	Figure 3.6-43.2
Figure 1.2-17.2	Figure 3.5-17	Figure 3.6-8	Figure 3.6-44.1
Figure 1.2-18	Figure 3.5-18	Figure 3.6-9	Figure 3.6-44.2
Figure 1.2-19	Figure 3.5-19	Figure 3.6-10	Figure 3.6-45.1
Figure 1.2-20	Figure 3.5-20	Figure 3.6-11	Figure 3.6-45.2
Figure 1.2-21	Figure 3.5-21	Figure 3.6-12	Figure 3.6-46.1
Figure 1.2-22	Figure 3.5-22	Figure 3.6-13	Figure 3.6-46.2
Figure 1.2-23	Figure 3.5-23	Figure 3.6-14	Figure 3.6-47.1
Figure 1.2-24	Figure 3.5-24	Figure 3.6-15	Figure 3.6-47.2
Figure 2.1-3	Figure 3.5-25	Figure 3.6-16	Figure 3.6-48.1
Figure 2.4-6.1	Figure 3.5-26	Figure 3.6-17	Figure 3.6-48.2
Figure 2.4-6.2	Figure 3.5-27	Figure 3.6-18	Figure 3.6-49.1
Figure 2.4-6.3	Figure 3.5-28	Figure 3.6-19	Figure 3.6-49.2
Figure 2.4-6.4	Figure 3.5-29	Figure 3.6-20	Figure 3.6-50.1
Figure 2.4-6.5	Figure 3.5-30	Figure 3.6-32.1	Figure 3.6-50.2
Figure 2.4-16	Figure 3.5-31	Figure 3.6-32.2	Figure 3.6-50.3
Figure 2.4-28	Figure 3.5-32	Figure 3.6-33.1	Figure 3.6-51.1
Figure 3.2-2	Figure 3.5-33	Figure 3.6-33.2	Figure 3.6-51.2
Figure 3.2-3	Figure 3.5-34	Figure 3.6-34.1	Figure 3.6-51.3
Figure 3.2-4	Figure 3.5-35	Figure 3.6-34.2	Figure 3.6-52.1

GO2-21-131

Attachment 6

Page 2 of 3

Information Withheld From Columbia Generating Station FSAR Amendment 66, Publicly Available (Attachment 5)			
Figure/Section	Figure	Figure	Figure
Figure 3.6-52.2	Figure 3.8-11	Figure 3A.2.1-1	Figure 3A.5.1-14b
Figure 3.6-53.1	Figure 3.8-12	Figure 3A.2.1-2	Figure 3A.5.1-15a
Figure 3.6-53.2	Figure 3.8-13	Figure 3A.2.1-3	Figure 3A.5.1-15b
Figure 3.6-54.1	Figure 3.8-17	Figure 3A.2.1-4	Figure 3A.5.1-16a
Figure 3.6-54.2	Figure 3.8-18	Figure 3A.2.1-5	Figure 3A.5.1-16b
Figure 3.6-55.1	Figure 3.8-20	Figure 3A.2.1-6	Figure 3A.5.1-17a
Figure 3.6-55.2	Figure 3.8-21	Figure 3A.2.1-7	Figure 3A.5.1-17b
Figure 3.6-56.1	Figure 3.8-22	Figure 3A.2.1-8	Figure 3A.5.1-18a
Figure 3.6-56.2	Figure 3.8-23	Figure 3A.2.1-9	Figure 3A.5.1-18b
Figure 3.6-57.1	Figure 3.8-24	Figure 3A.4.1-5	Figure 3A.5.1-19a
Figure 3.6-57.2	Figure 3.8-25	Figure 3A.4.1-6	Figure 3A.5.1-19b
Figure 3.6-57.3	Figure 3.8-26	Figure 3A.4.1-7	Figure 3A.5.1-20a
Figure 3.6-58	Figure 3.8-27	Figure 3A.4.2-1	Figure 3A.5.1-20b
Figure 3.6-59	Figure 3.8-28	Figure 3A.4.2-3	Figure 3A.5.1-21a
Figure 3.6-60.1	Figure 3.8-29	Figure 3A.5.1-1b	Figure 3A.5.1-21b
Figure 3.6-60.2	Figure 3.8-30	Figure 3A.5.1-2	Figure 3A.5.1-22a
Figure 3.6-65	Figure 3.8-31	Figure 3A.5.1-3a	Figure 3A.5.1-22b
Figure 3.6-66	Figure 3.8-32	Figure 3A.5.1-3b	Figure 3A.5.1-23a
Figure 3.6-85	Figure 3.8-33	Figure 3A.5.1-4a	Figure 3A.5.1-23b
Figure 3.6-86	Figure 3.8-34	Figure 3A.5.1-4b	Figure 3A.5.1-24a
Figure 3.6-87	Figure 3.8-35	Figure 3A.5.1-5a	Figure 3A.5.1-24b
Figure 3.6-88	Figure 3.8-36	Figure 3A.5.1-5b	Figure 3A.5.1-25a
Figure 3.6-92.1	Figure 3.8-37	Figure 3A.5.1-6a	Figure 3A.5.1-25b
Figure 3.6-92.2	Figure 3.8-38	Figure 3A.5.1-6b	Figure 3A.5.1-26a
Figure 3.6-92.3	Figure 3.8-39	Figure 3A.5.1-7a	Figure 3A.5.1-26b
Figure 3.6-93	Figure 3.8-40	Figure 3A.5.1-7b	Figure 3A.5.2-1
Figure 3.6-94.1	Figure 3.8-41	Figure 3A.5.1-8a	Figure 3A.5.2-2
Figure 3.6-94.2	Figure 3.8-42	Figure 3A.5.1-8b	Figure 3A.5.2-3
Figure 3.6-95	Figure 3.8-43	Figure 3A.5.1-9a	Figure 3A.5.2-4
Section 3.8.4	Figure 3.8-44	Figure 3A.5.1-9b	Figure 3A.5.2-5
Figure 3.8-1	Figure 3.8-45	Figure 3A.5.1-10a	Figure 3A.5.2-6
Figure 3.8-2	Figure 3.8-46	Figure 3A.5.1-10b	Figure 3A.5.2-7
Figure 3.8-3	Figure 3.8-47	Figure 3A.5.1-11a	Figure 3A.5.2-8
Figure 3.8-4.1	Figure 3.8-48	Figure 3A.5.1-11b	Figure 3A.5.2-9
Figure 3.8-4.2	Figure 3.8-49	Figure 3A.5.1-12a	Figure 3A.5.2-10
Figure 3.8-6	Figure 3.8-50	Figure 3A.5.1-12b	Figure 3A.D-11
Figure 3.8-7	Figure 3.8-51	Figure 3A.5.1-13a	Figure 3A.I-1
Figure 3.8-8	Figure 3.8-52	Figure 3A.5.1-13b	Figure 4.6-4
Figure 3.8-10	Figure 3.8-53	Figure 3A.5.1-14a	Figure 5.4-15.3

GO2-21-131

Attachment 6

Page 3 of 3

Information Withheld From Columbia Generating Station FSAR Amendment 66, Publicly Available (Attachment 5)			
Figure/Section	Figure/Table	Figure/Section	Figure
Figure 6.2-23	Figure 8.3-2	Figure 12.3-1	Figure F.6-21
Figure 6.2-32	Figure 8.3-4.1	Figure 12.3-2	Figure J.6-1.1
Figure 6.2-33	Figure 8.3-4.2	Figure 12.3-3	Figure J.6-1.2
Figure 8.1-1	Figure 8.3-4.3	Figure 12.3-4	Figure J.6-2.1
Figure 8.1-2.1	Figure 8.3-4.4	Figure 12.3-5	Figure J.6-2.2
Figure 8.1-2.2	Figure 8.3-4.5	Figure 12.3-6	Figure J.6-3.1
Figure 8.1-2.3	Figure 8.3-4.6	Figure 12.3-7	Figure J.6-3.2
Figure 8.1-2.4	Figure 8.3-5	Figure 12.3-8	Figure J.6-4
Figure 8.1-3	Figure 8.3-6	Figure 12.3-9	Figure J.6-5
Figure 8.1-4	Figure 8.3-7	Figure 12.3-10	Figure J.6-6
Figure 8.1-5	Figure 8.3-8	Figure 12.3-11	Figure J.6-7
Figure 8.1-6.1	Figure 8.3-9	Figure 12.3-12	Figure J.6-8
Figure 8.1-6.2	Figure 8.3-10	Figure 12.3-13	Figure J.6-9
Section 8.2.2	Figure 8.3-23	Figure 12.3-14	Figure J.6-10
Figure 8.2-1.1	Figure 8.3-24	Figure 12.3-15	Figure J.6-11
Figure 8.2-1.2	Figure 8.3-25	Figure 12.3-16	Figure J.6-12
Figure 8.2-2.1	Figure 8.3-26	Figure 12.3-17	Figure J.6-13
Figure 8.2-2.2	Figure 8.3-27	Figure 12.3-18	Figure J.6-14
Figure 8.2-3.1	Figure 8.3-28	Figure 12.3-22	Figure J.6-15
Figure 8.2-3.2	Figure 8.3-29	Section F.4.4.4	Figure J.6-16
Figure 8.2-3.3	Figure 8.3-30	Figure F.6-1	Figure J.6-17
Figure 8.2-3.4	Figure 8.3-32	Figure F.6-2	Figure J.6-18
Figure 8.2-4.1	Figure 8.3-33	Figure F.6-3	
Figure 8.2-4.2	Figure 8.3-34	Figure F.6-4	
Figure 8.2-4.3	Figure 8.3-35	Figure F.6-5	
Figure 8.2-4.4	Figure 8.3-36	Figure F.6-6	
Figure 8.2-5.1	Figure 8.3-37	Figure F.6-7	
Figure 8.2-5.2	Figure 8.3-38	Figure F.6-8	
Figure 8.2-5.3	Figure 8.3-52.1	Figure F.6-9	
Figure 8.2-5.4	Figure 8.3-52.2	Figure F.6-10	
Figure 8.2-6.1	Figure 8.3-53	Figure F.6-11	
Figure 8.2-6.2	Figure 9.1-4	Figure F.6-12	
Figure 8.2-6.3	Figure 9.1-5	Figure F.6-13	
Figure 8.2-6.4	Figure 9.1-13	Figure F.6-14	
Figure 8.2-7.1	Figure 9.2-7	Figure F.6-15	
Figure 8.2-7.2	Figure 9.2-13	Figure F.6-16	
Figure 8.2-7.3	Figure 9.2-14	Figure F.6-17	
Figure 8.2-7.4	Table 9.5-1	Figure F.6-18	
Figure 8.3-1	Figure 9.5-2	Figure F.6-19	
		Figure F.6-20	