



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

February 9, 2022

Mr. Robert Schuetz
Chief Executive Officer
Energy Northwest
76 North Power Plant Loop
P.O. Box 968 (Mail Drop 1023)
Richland, WA 99352

SUBJECT: COLUMBIA GENERATING STATION - AUDIT PLAN AND SETUP OF ONLINE REFERENCE PORTAL FOR LICENSE AMENDMENT REQUEST TO ADOPT 10 CFR 50.69, "RISK-INFORMED CATEGORIZATION AND TREATMENT OF STRUCTURES, SYSTEMS AND COMPONENTS FOR NUCLEAR POWER REACTORS" (EPID L-2021-LLA-0207)

Dear Mr. Schuetz:

By application dated November 9, 2021 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML21314A224), Energy Northwest (the licensee), submitted a license amendment request for Columbia Generating Station (Columbia). The proposed amendment would modify Columbia's operating license by the addition of a license condition that would allow for the implementation of the provisions of Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.69, "Risk informed categorization and treatment of structures, systems and components for nuclear power reactors."

To improve the efficiency of the U.S. Nuclear Regulatory Commission (NRC) staff reviews, the licensee's representatives and the NRC staff have discussed having a virtual audit using an online reference portal. The NRC staff plans to initially conduct a review of the documentation provided on the portal. The audit meeting with the licensee is scheduled for March 30–31, 2022. The online reference portal would allow the NRC staff to audit documents referenced in the request to determine whether the information included in the documents is necessary to reach a safety conclusion on the proposed amendment. The licensee will be formally requested to submit information needed to reach a safety conclusion on the NRC docket. Use of the online reference portal is acceptable as long as the following conditions are met:

- The online reference portal will be password-protected and passwords will be assigned to those directly involved in the review on a need-to-know basis;
- The online reference portal will be sufficiently secure to prevent NRC staff and contractors from printing, saving, or downloading any documents; and
- Conditions of use of the online reference portal will be displayed on the login screen and will require concurrence by each user.

The NRC staff would like to request that the portal be populated with the documents listed in the enclosure to this letter. This is the initial list identified by the NRC staff. The NRC staff may request additional documents during the review via email. Please provide the NRC staff with access to the portal and send me the information needed for access, such as username and password, as soon as possible. The conditions associated with the online reference portal must be maintained throughout the duration of the audit. Please provide written confirmation that Energy Northwest agrees to the terms and conditions set forth in this letter.

If you have any questions regarding this matter, I may be reached at (301) 415-8371 or via e-mail at Mahesh.Chawla@nrc.gov.

Sincerely,

/RA/

Mahesh L. Chawla, Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-397

Enclosure:
Audit Plan

cc: Listserv

AUDIT PLAN
REGARDING RISK-INFORMED CATEGORIZATION AND TREATMENT OF
STRUCTURES, SYSTEMS, AND COMPONENTS
ENERGY NORTHWEST
COLUMBIA GENERATING STATION
LICENSE AMENDMENT REQUEST TO ADOPT 50.69 CATEGORIZATION PROCESS
DOCKET NO. 50-397

1.0 BACKGROUND

By application dated November 9, 2021 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML21314A224), Energy Northwest (the licensee) submitted a license amendment request (LAR) for Columbia Generating Station (Columbia). The proposed amendment would modify the Columbia license by the addition of a license condition that would allow for the implementation of the provisions of Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.69, "Risk informed categorization and treatment of structures, systems and components for nuclear power reactors." The proposed changes are based on Nuclear Energy Institute (NEI) 00-04, "10 CFR 50.69 SSC [Structure, System, and Component] Categorization Guideline," Revision 0, dated July 2005 (ADAMS Accession No. ML052910035).

2.0 REGULATORY AUDIT BASES, SCOPE, AND METHODOLOGY

A regulatory audit is a planned license or regulation-related activity that includes the examination and evaluation of primarily non-docketed information. The audit is conducted to identify material required to be on the docket to support the basis of a licensing or regulatory decision. Performing a regulatory audit is expected to assist the U.S. Nuclear Regulatory Commission (NRC) staff in efficiently conducting its review of the LAR and to gain insights of the licensee's processes and procedures.

The bases for this remote audit are the licensee's LAR for Columbia, and NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants: LWR [Light-Water Reactor] Edition," Section 19.2, "Review of Risk Information Used to Support Permanent Plant-Specific Changes to the Licensing Basis: General Guidance" dated June 2007 (ADAMS Accession No. ML071700658).

The remote audit will be performed consistent with NRC Office of Nuclear Reactor Regulation (NRR) Office Instruction LIC-111, Revision 1, "Regulatory Audits," dated October 2019 (ADAMS Accession No. ML19226A274). The NRC staff plans to initially conduct a desk audit to review the documentation provided on the portal. The audit meeting with the licensee is scheduled for March 30–31, 2022. An audit was determined to be the most efficient approach toward a timely resolution of issues associated with this LAR review. The NRC staff will have an opportunity to minimize the potential for multiple rounds of requests for additional information (RAIs) and ensure no unnecessary burden will be imposed by requiring the licensee to address issues that

Enclosure

are no longer necessary to make a safety determination. Audit review items include the following:

- Understand how the licensee's proposed program implements the risk-informed application.
- Gain a better understanding of the detailed calculations, analyses, and bases underlying the LAR and confirm the NRC staff's understanding of the LAR.
- Gain a better understanding of plant design features and their implications for the LAR.
- Identify any information needed to enable the NRC staff's evaluation of the technical acceptability of the probabilistic risk assessment (PRA) used for this application.
- Identify any information needed to enable the NRC staff's evaluation of whether the proposed changes challenge design-basis functions or adversely affect the capability or capacity of plant equipment to perform design-basis functions.
- Identify questions and requests that may become formal RAIs consistent with the guidance in NRR Office Instruction LIC-115, Revision 1, "Processing Requests for Additional Information," dated August 9, 2021 (ADAMS Accession No. ML21141A238).

3.0 INFORMATION AND OTHER MATERIALS NECESSARY FOR THE REGULATORY REMOTE AUDIT

The NRC staff will request information as needed. The NRC staff will use an "audit items list" to identify the information (e.g., methodology, process information, and calculations) to be audited and the subjects of requested interviews and meetings. The NRC staff requests the licensee to have the requested audit information listed in the audit document request to be readily available and accessible for the NRC staff's review via a Web-based portal.

The NRC staff requests the licensee to have the information referenced in the Attachment to this audit plan available and accessible for the NRC staff's review via an online reference portal within 2 weeks of the date of this audit plan. The NRC staff requests that any supplemental information requested be available and accessible for the NRC staff's review within 1 week of the date of the NRC's notification to the licensee of the new requests.

The NRC audit team consists of the Division of Operating Reactor Licensing (DORL) licensing project manager; NRC staff from the Division of Risk Assessment (DRA), PRA Licensing Branch A (APLA), PRA Licensing Branch B (APLB), PRA Licensing Branch C (APLC), and PRA Oversight Branch (APOB); and two NRC contractors from United States Department of Energy Pacific Northwest National Laboratory (PNNL). The NRC staff will audit the PRA methods that the licensee plans to use to determine the risk impact, including the licensee assessments of internal events (including internal flooding) and fire PRAs. The NRC staff will also audit the licensee's quantification of risk from significant external events, whether the licensee uses PRA or bounding methods, and the licensee's evaluation of defense-in-depth. The specific audit team is described below in Section 4.0.

4.0 AUDIT TEAM

NRR Staff/Contractor	Email	RTR	QA	Division/Branch
DORL PM	Mahesh.Chawla@nrc.gov			DORL/LPL4
APOB Lead RTR	John.Hughey@nrc.gov	X		DRA/APOB
APLA QAr	Adrienne.Driver@nrc.gov		X	DRA/APLA
APLB Lead RTR	Naeem.Iqbal@nrc.gov	X		DRA/APLB
APLB QAr	JS.Hyslop@nrc.gov		X	DRA/APLB
APLC Lead RTR	Alissa.Neuhausen@nrc.gov	X		DRA/APLC
APLC QAr	Keith.Tetter@nrc.gov		X	DRA/APLC
PNNL	Mark.Wilk@pnnl.gov	X		-
PNNL	Steve.Short@pnnl.gov		X	-

Note: reactor technical reviewer (RTR), quality assurance (QA), and quality assurance reviewer (QAr)

5.0 SPECIAL REQUESTS

The NRC staff requests access to requested documents and information through an online reference portal that allows the NRC staff and contractors to access documents over the Internet. The following conditions associated with the online reference portal must be maintained while the NRC staff and contractors have access to the online portal

- The online portal will be password-protected. A separate password will be assigned to each member of the NRC staff and each of the NRC contractors participating in the audit.
- The online portal will prevent the NRC participants from printing, saving, downloading, or collecting any information directly from the online reference portal.
- Conditions of use of the online reference portal will be displayed on the login screen and will require acknowledgment by each user.

Username and password information should be provided directly to members of the NRC staff and contractors. The NRC licensing project manager will provide the licensee names and contact information of the NRC staff and contractors participating in the audit. All other communications should be coordinated through the NRC licensing project manager.

6.0 DELIVERABLES

The NRC staff would like access to the documents requested through the online reference portal that allows the NRC staff and contractors to access documents remotely by February 15, 2022. The NRC staff and contractor's access to the online portal should be terminated by June 30, 2022. The NRC staff will issue an audit summary report within 90 days of the completion of the audit. The NRC staff will develop any RAIs, as needed, consistent with the guidance in NRR Office Instruction LIC-115, Revision 1, and issue such RAIs separately from audit-related correspondence.

Attachment:
Requested Audit Materials List

REQUESTED AUDIT MATERIALS LIST

ITEM	AUDIT DOCUMENT REQUEST
1	Reports of all peer reviews (full-scope and focused-scope), self-assessments, and facts & observations (F&Os) closure reviews for the internal events, internal flooding, fire, and seismic probabilistic risk assessment (PRA) cited in Columbia Generating Station (Columbia) Title 10 of the <i>Code of Federal Regulations</i> (10 CFR) Section 50.69 license amendment request (LAR).
2	Uncertainty notebooks for the Columbia internal events, internal flooding, fire, and seismic PRAs related to PRA model assumptions and sources of uncertainty.
3	Documentation on evaluation of the generic and plant specific uncertainties with respect to the Columbia 10 CFR 50.69 LAR.
4	PRA notebooks for the modeling of Diverse and Flexible Coping Strategies (FLEX) equipment and FLEX human error probabilities, if credited in the PRA.
5	Available 10 CFR 50.69 structures, systems, and components categorization program procedures (e.g., categorization review and adjustment process, decision criteria for Integrated Decisionmaking Panel).
6	Any notebooks and peer reviews on the screening of other external hazards.
7	Any other supporting documentation that the licensee may determine is responsive to the above U.S. Nuclear Regulatory Commission staff's information requests.

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KTetter, NRR

AYoung, NRR

DWidrevitz, NRR

JZhao, NRR

ADonley, RIV

HFreeman, RIV

JKozal, RIV

PNiebaum, RIV

ADAMS Accession No. ML22032A014***concurrence via e-mail**

OFFICE	NRR/DORL/LPL4/PM*	NRR/DORL/LPL4/LA*	NRR/DRA/APLA/BC*	NRR/DRA/APLB/BC*
NAME	MChawla	PBlechman	RPascarelli	JWhitman
DATE	1/31/2022	2/3/2022	1/24/2022	1/25/2022
OFFICE	NRR/DRA/APLC/BC*	NRR/DRA/APOB/BC*	NRR/DORL/LPL4/BC*	NRR/DORL/LPL4/PM*
NAME	SRosenberg	AZoulis	JDixon-Herrity	MChawla
DATE	1/27/2022	1/24/2022	2/8/2022	2/9/2022

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