

September 13, 2007

Mr. J. V. Parrish
Chief Executive Officer
Energy Northwest
P.O. Box 968 (Mail Drop 1023)
Richland, WA 99352-0968

SUBJECT: COLUMBIA GENERATING STATION - REQUEST FOR ADDITIONAL
INFORMATION RELATED TO LICENSE AMENDMENT REQUEST
ASSOCIATED WITH CONDENSATE STORAGE TANK LEVEL
(TAC NO. MD6176)

Dear Mr. Parrish:

By letter to the U.S. Nuclear Regulatory Commission (NRC) dated August 8, 2007, Energy Northwest submitted a license amendment request for Columbia Generating Station to revise the requirements of Technical Specification (TS) 3.3.5.2, "Reactor Core Isolation Cooling (RCIC) System Instrumentation," and TS 3.5.2, "ECCS [Emergency Core Cooling System]-Shutdown," to increase the Condensate Storage Tank (CST) level.

The NRC staff is reviewing your submittal and has determined that additional information is required to complete its review. The specific information requested is addressed in the enclosure to this letter. During a discussion with Mr. G. Cullen of your staff on August 31, 2007, it was agreed that you would provide a response by November 30, 2007, to this request for additional information.

The NRC staff considers that timely responses to requests for additional information help ensure sufficient time is available for staff review and contribute toward the NRC's goal of efficient and effective use of staff resources. If circumstances result in the need to revise the requested response date, please contact me at (301) 415-2296.

Sincerely,

/RA/

Carl F. Lyon, Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-397

Enclosure: Request for Additional Information

cc w/encl: See next page

Columbia Generating Station

cc:

Chairman
Energy Facility Site Evaluation Council
P.O. Box 43172
Olympia, WA 98504-3172

Mr. Douglas W. Coleman (Mail Drop PE20)
Manager, Regulatory Programs
Energy Northwest
P.O. Box 968
Richland, WA 99352-0968

Chairman
Benton County Board of Commissioners
P.O. Box 190
Prosser, WA 99350-0190

Mr. William A. Horin, Esq.
Winston & Strawn
1700 K Street, N.W.
Washington, DC 20006-3817

Mr. Matt Steuerwalt
Executive Policy Division
Office of the Governor
P.O. Box 43113
Olympia, WA 98504-3113

Ms. Lynn Albin
Washington State Department of Health
P.O. Box 7827
Olympia, WA 98504-7827

Technical Services Branch Chief
FEMA Region X
130 - 228th Street, SW
Bothell, WA 98021-9796

Mr. Mike Hammond
Department of Homeland Security
FEMA/REP
130 - 228th Street SW
Bothell, WA 98021-9796

Regional Administrator, Region IV
U.S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011-4005

Senior Resident Inspector
U.S. Nuclear Regulatory Commission
P.O. Box 69
Richland, WA 99352-0069

Assistant Director
Nuclear Safety and Energy Siting Division
Oregon Department of Energy
625 Marion Street NE
Salem, OR 97301-3742

Special Hazards Program Manager
Washington Emergency Management Div.
127 W. Clark Street
Pasco, WA 99301

June 2007

September 13, 2007

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Chief Executive Officer
Energy Northwest
P.O. Box 968 (Mail Drop 1023)
Richland, WA 99352-0968

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ADAMS Accession Number: ML072480037

*Memo dated

OFFICE	LPL4/PM	LPL4/LA	EICB/BC	LPL4/BC
NAME	FLyon	JBurkhardt	WKemper*	THiltz, MTM for
DATE	9/12/07	9/10/07	8/30/07	9/13/07

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REQUEST FOR ADDITIONAL INFORMATION
RELATED TO LICENSE AMENDMENT REQUEST ASSOCIATED WITH
CONDENSATE STORAGE TANK LEVEL
ENERGY NORTHWEST
COLUMBIA GENERATING STATION
DOCKET NUMBER 50-397

The license amendment request (LAR), dated August 8, 2007, proposes the following Technical Specifications (TS) changes:

- Condensate Storage Tank Level-Low Allowable Value in TS Table 3.3.5.2-1, Core Cooling Isolation System Instrumentation from “ \geq 446 ft 0 inches elevation” to “ \geq 447 ft 7 inches elevation.”
- Condensate Storage Tank (CST) water level in SR [Surveillance Requirement] 3.3.5.2-2, from “ \geq 14.8 ft in a single CST or \geq 9.1 ft in each CST” to “ \geq 16.5 ft in a single CST or \geq 10.5 ft in each CST.”

To support U.S. Nuclear Regulatory Commission (NRC) assessment of the acceptability of the LAR with regard to setpoint changes, please provide the following for each setpoint to be added or modified:

1. Setpoint Calculation Methodology: Provide documentation (including sample calculations) of the methodology used for establishing the limiting setpoint (or NSP) and the limiting acceptable values for the As-Found and As-Left setpoints as measured in periodic surveillance testing as described below. Indicate the related Analytical Limits and other limiting design values (and the sources of these values) for each setpoint.
2. Safety Limit (SL)-related Determination: Provide a statement as to whether or not the setpoint is a limiting safety system setting (LSSS) for a variable on which a safety limit (SL) has been placed as discussed in paragraph 50.36(c)(1)(ii)(A) of Title 10 of the *Code of Federal Regulations* (10 CFR). Such setpoints are described as “SL-Related” in the discussions that follow. In accordance with 10 CFR 50.36(c)(1)(ii)(A), the following guidance is provided for identifying a list of functions to be included in the subset of LSSSs specified for variables on which SLs have been placed as defined in Standard Technical Specifications (STS) Sections 2.1.1, Reactor Core SLs, and 2.1.2, Reactor Coolant System Pressure SLs. This subset includes automatic protective devices in TSs for specified variables on which SLs have been placed that: (1) initiate a reactor trip; or (2) actuate safety systems. As such, these variables provide protection against violating reactor core safety limits, or reactor coolant system pressure boundary safety limits.

Examples of instrument functions that might have LSSs included in this subset in accordance with the plant-specific licensing basis, are pressurizer pressure reactor trip (pressurized-water reactors), rod block monitor withdrawal blocks (boiling-water reactors), feedwater and main turbine high-water level trip (boiling-water reactors), and end-of-cycle recirculation pump trip (boiling-water reactors). For each setpoint, or related group of setpoints, that you determined not to be SL-Related, explain the basis for this determination.

3. For Setpoints That Are Determined to Be SL-related: The NRC letter to the NEI SMTF dated September 7, 2005 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML052500004), describes Setpoint-Related TS (SRTS) that are acceptable to the NRC for instrument settings associated with SL-related setpoints. Specifically, Part "A" of the Enclosure to the letter provides limiting conditions for operations notes to be added to the TS, and Part "B" includes a checklist of the information to be provided in the TS Bases related to the proposed TS changes.
 - a. Describe whether and how you plan to implement the SRTS suggested in the September 7 letter. If you do not plan to adopt the suggested SRTS, then explain how you will ensure compliance with 10 CFR 50.36 by addressing items 3b and 3c below:
 - b. As-Found Setpoint Evaluation: Describe how surveillance test results and associated TS limits are used to establish operability of the safety system. Show that this evaluation is consistent with the assumptions and results of the setpoint calculation methodology. Discuss the plant corrective action processes (including plant procedures) for restoring channels to operable status when channels are determined to be "inoperable" or "operable but degraded." If the criteria for determining operability of the instrument being tested are located in a document other than the TS (e.g. plant test procedure) explain how the requirements of 10 CFR 50.36 are met.
 - c. As-Left Setpoint Control: Describe the controls employed to ensure that the instrument setpoint is, upon completion of surveillance testing, consistent with the assumptions of the associated analyses. If the controls are located in a document other than the TS (e.g., plant test procedure) explain how the requirements of 10 CFR 50.36 are met.
4. For Setpoints That Are Determined Not to Be SL-related: Describe the measures to be taken to ensure that the associated instrument channel is capable of performing its specified safety functions in accordance with applicable design requirements and associated analyses. Include in your discussion information on the controls you employ to ensure that the as-left trip setting after completion of periodic surveillance is consistent with your setpoint methodology. Also, discuss the plant corrective action processes (including plant procedures) for restoring channels to operable status when channels are determined to be "inoperable" or "operable but degraded." If the controls are located in a

document other than the TS (e.g., plant test procedure), describe how it is ensured that the controls will be implemented.

REFERENCES:

1. Letter from Timothy J. Kobetz, NRC, to Technical Specifications Task Force (TSTF), "TSTF Traveler 493, Revision 1, "Clarify Application of Setpoint Methodology for LSSS Functions," dated December 14, 2006, available on the NRC public website in ADAMS Accession No. ML063450324.
2. NRC Regulatory Issue Summary 2006-17, "NRC Staff Position on the Requirements of 10 CFR 50.36, 'Technical Positions,' Regarding Limiting Safety System Settings During Periodic Testing and Calibration of Instrument Channels," dated August 24, 2006, ADAMS Accession No. ML051810077.
3. Letter from Patrick L. Hiland, NRC, to NEI [Nuclear Energy Institute] Setpoint Methods Task Force, "Technical Specification for Addressing Issues Related to Setpoint Allowable Values," dated September 7, 2005, ADAMS Accession No. ML052500004.
4. Letter from Bruce A. Boger, NRC, to Alexander Marion, NEI, "Instrumentation, Systems, and Automatic Society (ISA) S67.04 Methods for Determining Trip Setpoints and Allowable Values for Safety-Related Instrumentation," dated August 23, 2005, ADAMS Accession No. ML051660447.
5. Letter from James A. Lyons, NRC, to Alex Marion, NEI, "Instrumentation, Systems, and Automation Society S67.04 Methods for Determining Trip Setpoints and Allowable Values for Safety-Related Instrumentation," dated March 31, 2005, ADAMS Accession No. ML050870008.