

Exhibit 47



Create another New Issue



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Exelon Nuclear Issue - Statement of Confirmation

Issue #: 00557180

Originator: KATHY BARNES

Submit Date: November 13, 2006

Basic Information

Affected Facility: Oyster Creek

Dscv Date: 11/07/2006 11:00

How Discovered Code: H02

Event Date: 11/07/2006 11:00

Affected Unit: NA

Affected Sys: --

Subject: COMMITMENTS MADE FOR GL 87-05 ARE NOT IN THE RA DATABASE

Required Information

Condition Description:

Commitments were made as a result of the GL 87-05 as well as other correspondence, meetings, etc. concerning our Drywell Corrosion Monitoring and Water Intrusion mitigation plans. The correspondence covers the time period of 1986 through present. A check of the Lotus Notes database presently used for commitment tracking did not indicate any commitments have been made. Based on limited research an SER was issued with subsequent correspondence, which committed us to a corrosion monitoring activities and leakage monitoring activities for the Drywell. The correspondence was used to formulate what is thought to be the present commitments for leakage monitoring. That information was utilized as an input to the outage leakage monitoring activities to determine the steps necessary to meet the present commitments and the License Renewal commitments for leakage monitoring. The documents were annotated with reference to the correspondence for the present commitments and to Passport commitment tracking numbers for the License Renewal commitments.

Subsequent research determined other correspondence exists which indicated we initiated "preventive maintenance to clear the sand bed drains periodically". There were no preventive maintenance activities prior to this outage to clear the sand bed drains. It is not known at this time whether this is a commitment by virtue of it being in our correspondence with the NRC. IR 547236 documents the existence of debris in the sand bed drains, when performing the first known formalized maintenance activity to inspect the drains. Although the debris did not affect the capability to monitor the leakage from the sand bed drains, there is a question of where did the debris come from and when should be the next time we inspect the drains, and on what frequency. An ACIT was issued to address these concerns. No

frequency is presented in the previous correspondence found, but there may be other correspondence, which did make commitments to a frequency, or removed this activity. Without having a commitment tracking system for these historical commitments renders the site to potential repeat occurrences of missed commitments from a current license basis perspective.

Immediate actions taken:

License renewal assembled a partial list of documents retrieved from the correspondence database that had been assembled to support the License Renewal Project. Correspondence was discovered relevant to the water intrusion measures including the monitoring of the sand bed drains. Regulatory Assurance was notified of the finding.

This IR was submitted.

Recommendation for action:

1. Perform a complete review of all correspondence relative to the GL 87-05, and the drywell corrosion monitoring and water intrusion mitigation plan for legitimate commitments. Review these commitments for confirmation of implementation. For commitments that are determined to no longer be appropriate, disposition those commitments in accordance with the corporate commitment management procedures.

Assure documents are annotated properly for commitments, which will be retained. Enter those commitments into the commitment tracking system with cross-references to the implementing documents for retrieval purposes. This is required to answer an existing question for the NRC Inspection 2006-13 Report, which is ongoing.

2. Considering the risks associated with missing commitments (examples being: failure to perform leakage monitoring for the sand bed drains, potentially failure to perform periodic clearing of the sand bed drains, etc.) evaluate the need to initiate efforts to retrieve historical commitments, and confirm formal implementation mechanisms exist for those items determined to be legitimate commitments, and that they are being tracked and annotated in accordance with corporate commitment tracking requirements. This would be a significant manpower effort and probably require outside support.

3. Develop and expand the correspondence data base similar to the one which was provided to regulatory assurance from the license renewal project for easy retrieval of the basis documents which provide an input to our Current License Basis (CLB). This would also be beneficial for those performing 50.59 evaluations, which rely on the determination of our CLB.

Supervisor Verbally Contacted J. Kandasamy

Optional Additional Information

What activities, processes, or procedures were involved? During 1R21, NRC Inspections of the drywell water intrusion activities prompted a more extensive search for related correspondence.

Why did the condition happen? The age of OC has resulted in an enormous volume of regulatory correspondence that had not

been reviewed in searching for prior commitments. Commitments were not tracked in a database for all the years of OC operation. Changes of ownership and changes in definition of what constitutes a commitment has resulted in inadequate understanding of what this older correspondence requires.

What are the consequences?

Without having a commitment tracking system or proper disposition of these historical commitments renders the site to potential repeat occurrences of missed commitments from a current license basis perspective.

Any procedural requirements impacted?

LS-AA-110 provides requirements for managing commitments in current regulatory correspondence. This issue report is related to historical commitments made by GPUN.

Identify any adverse physical conditions:

There was no PM established to periodically clear the sand bed drains of clogs.

List of Knowledgeable individuals:

T.Quintenz, H.Ray, P.Tamburro, J.Huffnagel, J.Kandasamy, D.Helker

Is this a repeat or similar condition?

Yes. There have been other recent examples of missed commitments from "old" correspondence that had not been captured in the OC commitment tracking database. IR 348545 (Tell-tale Drains - Poly bottles not having a PM to monitor DW leakage)

Routing

Owed To Group:

ACAPALL

Routed to Group:

CR-OSC

Exhibit 52

From: Quintenz, Tom <Tom.Quintenz@exeloncorp.com>
Sent: Wednesday, September 20, 2006 2:02 PM
To: Ouaou, Ahmed <u999ao2@ucm.com>; Hufnagel Jr, John G <u000jgh@ucm.com>
Cc: Tamburro, Peter <u777p0t@ucm.com>; Warfel Sr, Donald B <u001dbw@ucm.com>; O'Rourke, John F. <t925jfo@ucm.com>
Subject: RE: Inspection of Sand Bed Drain Lines

I am responding to my action item from Dave Ryan that this is not a commitment, but must remain in scope for the outage.

-----Original Message-----

From: Ouaou, Ahmed
Sent: Wednesday, September 20, 2006 1:36 PM
To: Quintenz, Tom; Hufnagel Jr, John G
Cc: Tamburro, Peter; Warfel Sr, Donald B; O'Rourke, John F.
Subject: RE: Inspection of Sand Bed Drain Lines

I'll discuss with Don and John O' during turn over. I also think it is a good idea to look at the drains and sandbed floor for debris that could get into the drains when the coating in the bays with drains is inspected. It is not a commitment to check the drains; but we would not look good if we flood the sandbed because the drains are plugged

-----Original Message-----

From: Quintenz, Tom
Sent: Friday, September 15, 2006 5:36 PM
To: Hufnagel Jr, John G
Cc: Ouaou, Ahmed; Tamburro, Peter
Subject: RE: Inspection of Sand Bed Drain Lines

With regard to the suggested check of the configuration, suggest that we agree on the change and have the KS program engineer issue a revision to the appropriate recurring task(s) to implement the requirement.

-----Original Message-----

From: Hufnagel Jr, John G
Sent: Friday, September 15, 2006 5:03 PM
To: Quintenz, Tom
Cc: Ouaou, Ahmed; Tamburro, Peter
Subject: RE: Inspection of Sand Bed Drain Lines

I agree with your assessment. I also reviewed the June 20, 2006 letter which responded to NRC concerns outlined in the June 1 Public meeting, and as expected, found no commitment to inspect the sand bed drain lines for blockage.

As a separate but related point, do we have a recurring task to ensure that the tubing that goes from the sand bed drain to the poly bottles is intact? It seems we should verify the integrity of this configuration on some regular interval, even if it is not a commitment.

- John.

OCLR00013796

-----Original Message-----

From: Quintenz, Tom
Sent: Friday, September 15, 2006 4:29 PM
To: Hufnagel Jr, John G
Cc: Ouaou, Ahmed; Tamburro, Peter
Subject: Inspection of Sand Bed Drain Lines

John, Please confirm the following conclusion relative to the sand bed drain line inspection. This is needed to satisfy an action item I received from an outage planning meeting this week. Thanks.

Conclusion: It appears the inspection of the sand bed drain lines for blockage is not currently a commitment. This is based on my review of the current A.5 table of commitments, review of the July 7, 2006 letter to the NRC, and discussions with Ahmed Ouaou. Examination of the trough drain for blockage is a commitment and is contained in our table of commitments and is specifically listed in the July 7, 2006 letter. I have attached a copy of the letter for your reference if needed.

<< File: 2130-06-20358 Additional Appendix A Clarifications - 7-7-06.pdf >>

OCLR00013797

AR 00547236 Report

Aff Fac:	Oyster Creek	AR Type:	CR	Status:	APPROVED
Aff Unit:	NA	Owed To:	ACAPALL	Due Date:	11/20/2006
Aff System:	187			Event Date:	10/21/2006
CR Level/Class:	/			Disc Date:	10/21/2006
How Discovered:	H02			Orig Date:	10/21/2006
WR/PIMS AR:		Component #:			

Action Request Details

Subject: DEBRIS LOCATED IN BAYS 7 AND 11 SANDBED DRAIN LINES

Description:

Originator: PETER TAMBURRO Supv Contacted: Howie Ray

Condition Description:

Inspection of the Sandbed Drain Lines in accordance with Specification IS-328227-004 Rev. 13 showed that the drain line in bay 7 has debris, which could cause blockage of this line. The debris looks like loose concrete. This does not meet the acceptance criteria in the specification per section 3.2.5.2.

In addition the inspection of the drain line in bay 11 shows some loose debris in the bottom of the line directly downstream of the first elbow. However the line is not blocked and meets the acceptance criteria.

Operability

The purpose of the drain lines is to route water in the sandbed from the drywell vessel. At this time the remaining 4 lines are capable of performing this function. In addition since the line in bay 7 is not completely blocked it too would partially perform its function by draining the sandbed. So far in 1R21 no water has entered the sandbed.

Engineering has inspected the 5 bottles every day since the beginning of the outage (R2088495). To date no water has been found in any of the bottles or on the floor outside the sandbed bays.

Also Engineering and/or NDE have inspected all 10 Drywell Sandbed bays. To date no water or moisture has been observed in these bays and the coating is in good condition..

Engineering will continue to monitor (on a daily basis) the trough drain line for changes in flow rate and the five polyvinyl bottles for water.

Immediate actions taken:

Informed Howie Ray and the Engineering Control Center

Recommended Actions:

- 1) Continue to monitor the five poly bottles and trough drain line daily per our commitments
- 2) Recommend cleaning the drain lines in bays 7 and 11.

Operable Basis:

Reportable Basis:

Assignments

Assign #:	01	Assigned To:		Status:	AWAIT/C
Aff Fac:	Oyster Creek	Prim Grp:	ACAPALL	Due Date:	10/26/2006
Assign Type:	TRKG	Sec Grp:		Orig Due Date:	##/##/####
Priority:					
Schedule Ref:					
Unit Condition:					
Subject/Description:	DEBRIS LOCATED IN BAYS 7 AND 11 SANDBED DRAIN LINES				