

**UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD**

**Before Administrative Judges:
E. Roy Hawkens, Chair
Dr. Paul B. Abramson
Dr. Anthony J. Baratta**

In the Matter of:)	
)	September 14, 2007
AmerGen Energy Company, LLC)	
(License Renewal for Oyster Creek Nuclear Generating Station))	Docket No. 50-219
)	
)	

**AMERGEN'S PRE-FILED SURREBUTTAL TESTIMONY
PART 1
INTRODUCTION, DRYWELL PHYSICAL STRUCTURE,
HISTORY, AND COMMITMENTS**

I. WITNESS BACKGROUND

Q. 1: Please state your names and current titles. The Board knows that a description of your current responsibilities, background and professional experience was provided in Part 1 of AmerGen's Pre-Filed Direct Testimony on July 20, 2007, so there is no need for you to repeat that information here.

A. 1: (JFO) My name is John F. O'Rourke. I am a Senior Project Manager, License Renewal, for Exelon, AmerGen Energy Company, LLC's ("AmerGen") parent company.

(FWP) My name is Frederick W. Polaski. I am the Manager of License Renewal for Exelon.

(MPG) My name is Michael P. Gallagher, and I am the Vice President for License Renewal for Exelon.

Q. 2: Would you please summarize the purpose of this SurRebuttal Testimony?

A. 2: (All) The purpose of this SurRebuttal Testimony is to respond to the information provided in Citizens' Rebuttal Statement Regarding Relicensing of Oyster Creek Nuclear Generating Station ("Citizens' Rebuttal Statement") and in the Pre-Filed Rebuttal Testimony of Dr. Rudolf H. Hausler, regarding the drywell physical structure and AmerGen's regulatory commitments.

II. DRYWELL PHYSICAL STRUCTURE

Q. 3: Dr. Hausler alleges that "the exterior of the sandbed region . . . has very limited air exchange." (Citizens' Rebuttal Testimony, A.22). Citizens use this allegation to question Ed Hosterman's evaporation calculation in AmerGen's Direct Testimony, Part 6, A.19. Is Dr. Hausler correct?

A. 3: (All) No. Applicant's Exhibits 4 and 7 show that the drywell vents penetrate the concrete at the top of the sand bed region. The clearance between the concrete and the vents is greater than 3". There are 10 vents. Since the vent lines are approximately 4 feet in diameter, the gap between the vent and the concrete provides approximately 5.3 square feet for air flow in each bay. Additionally, many piping penetrations from the drywell have similar openings. Thus, there is substantial area for air flow through the sand bed region. In Part 6, Ed Hosterman will explain why air flow is expected through the sand bed region.

III. REGULATORY COMMITMENTS

Q. 4: Citizens allege that “[t]he plant could be forced into an outage that requires the fuel cavity to be flooded before there is any chance to apply measures to mitigate leaks in the cavity liner” (Citizens’ Rebuttal Statement, page 19; Hausler Rebuttal Testimony, A.23). How do you respond?

A. 4: (All) To clarify Part 1 of AmerGen’s Direct Testimony, we did not state, nor did we imply, that strippable coating and metal tape would not be applied during a forced outage in which the reactor cavity is filled with water. We merely stated that, “[t]he reactor cavity may be required to be filled with water during a forced outage when the reactor vessel must be opened. Such outages are rare.”

AmerGen Dir. Part 1 A.17.

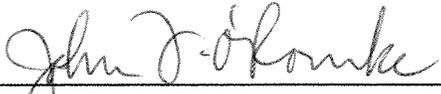
(MPG) My testimony summarized AmerGen’s commitments to perform future actions related to drywell shell sand bed region corrosion control, including the commitment that “[a] strippable coating will be applied to the reactor cavity liner to prevent water intrusion between the drywell shield wall and the drywell shell *during periods when the reactor cavity is flooded.*” (emphasis added.)

Citizens then appear to have assumed that this commitment did not apply to forced outages, but Citizens are wrong. The commitment *does* extend to any non-refueling outage that would require the reactor cavity to be filled with water. The reason that the implementation schedule refers only to “refueling outages” is that we do not anticipate such an outage in the future.

Q.5: Does this conclude your testimony?

A. 5: (All) Yes.

In accordance with 28 U.S.C. § 1746, I state under penalty of perjury that the foregoing is true and correct:



John F. O'Rourke

9-12-07
Date



Frederick W. Polaski

9/12/07
Date



Michael P. Gallagher

9-12-07
Date