

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
OFFICE OF THE SECRETARY

ATOMIC SAFETY AND LICENSING BOARD

Before Administrative Judges:

E. Roy Hawkens, Chair
Dr. Paul B. Abramson
Dr. Anthony J. Baratta

In the Matter of)	
)	Docket No. 50-0219-LR
AMERGEN ENERGY COMPANY, LLC)	
)	ASLB No. 06-844-01-LR
(License Renewal for the Oyster Creek)	
Nuclear Generating Station))	April 3, 2006

Citizens' Response to 10 C.F.R. § 2.336(a)(1)

Citizens based the contention in part on the opinion of an expert on corrosion, Dr. R.H. Hausler. This opinion is Petitioners' Exhibit 13. Dr. Hausler's contact details are provided on the Exhibit.

Documents on which the opinion of Dr. R.H. Hausler, dated November 10 2005, is based:

Title: NRC Information Notice No. 86-99: Degradation of Steel Containments
Document Date: 12/08/1986 (PETITIONERS' EXHIBIT 1)

Title: NRC Information Notice No. 86-99, Supplement 1: Degradation of Steel Containments issued in response to drywell corrosion at Oyster Creek.
Document Date: 02/14/1991 (PETITIONERS' EXHIBIT 2)

Title: NRC Evaluation Report on Structural Integrity of the Oyster Creek Drywell (TAC No. M79166) states that "it is essential that GPUN continue UT thickness measurements at refueling outages and at outages of opportunity for the life of the plant."
Document Date: 04/24/1992 (PETITIONERS' EXHIBIT 3)

Title: Summary of May 5, 1993, Meeting with GPU Nuclear Corporation (GPUN) to Discuss Matters Related to the Oyster Creek Drywell Corrosion Mitigation Program, cover letter.
Document Date: 05/17/1993 (PETITIONERS' EXHIBIT 4)

Title: Enclosure 2 of GPUN viewgraphs which includes 14R UT measurements of Summary of May 5, 1993, Meeting with GPU Nuclear Corporation (GPUN) to Discuss Matters Related to the Oyster Creek Drywell Corrosion Mitigation Program.
Document Date: 05/17/1993 (PETITIONERS' EXHIBIT 5)

Title: GPUN, Oyster Creek Drywell Corrosion Monitoring Program, assessment of drywell liner condition performed during 15R outage with Table 1 and viewgraphs.
Document Date: 09/15/1995 (PETITIONERS' EXHIBIT 6)

Title: AmerGen, Oyster Creek Generating Station Refueling Outage 20 (1R20) Inservice Inspection (ISI) Summary Report
Document Date: 02/16/2005 (PETITIONERS' EXHIBIT 7)

Title: NRC Meeting Summary of May 12, 2005, Annual Assessment Meeting with AmerGen (Excerpted cover page and p. 6)
Document Date: 06/21/2005 (PETITIONERS' EXHIBIT 8)

Title: NRC letter regarding "Changes in the Oyster Creek Drywell Monitoring Program" (TAC No. M93658) accepting changes in drywell monitoring program as planned by GPUN if GPUN commits to additional inspection within 3 months after discovery of water leakage from the pools above reactor cavity.
Document Date: 11/01/1995 (PETITIONERS' EXHIBIT 9)

Title: GPU Nuclear letter proposes to commit to requested for additional inspections should the referenced water leakage not apply to minor leakage associated with normal refueling outage activities.
Document Date: 12/15/1995 (PETITIONERS' EXHIBIT 10)

Title: NRC letter "Changes in the Drywell Corrosion Monitoring Program" in reply to 12/15/1995 GPUN proposal for leakage not to apply to normal refueling activities and is defined as less than 12 GPM.
Document Date: 02/15/1996 (PETITIONERS' EXHIBIT 11)

Title: AmerGen, Response to NRC Request for Additional Information (RAI 2.5.1. 19-1) Excerpts Page 1-2 and 10-11 of 19
Document Date: 10/12/2005 (PETITIONERS' EXHIBIT 12)

Title: National Association of Corrosion Engineers, International, Standard Test Method TM-00384: "Holiday Detection of Internal Tubular Coatings of 250 μm (10 mils) dry Film Thickness"
Document Date: 1994 (or latest edition)
Location: NACE Book of Standards, Vol. 2, 1997, Standard Test Methods – Standard Material Requirements

Title: National Association of Corrosion Engineers, International, Standard Recommended Practice, RP-0188-90, "Discontinuity Testing of Protective Coatings"
Location: NACE Book of Standards, Vol. 1, 1997, Standard Recommended Practices

Title: National Association of Corrosion Engineers, International, Standard Test Method TM-0186-94: Holiday Detection of Internal Tubular Coatings of 250 to 760 μm (10 to 30 mils) Dry Film Thickness
Location: NACE Book of Standards, Vol. 2, 1997, Standard Test Methods – Standard Material Requirements

Title: National Association of Corrosion Engineers, International, Test Method TM-0183, "Evaluation of Internal Plastic Coating for Corrosion Control of Tubular Goods in Aqueous flowing Environment"
Location: NACE Book of Standards, Vol. 2, 1997, Standard Test Methods – Standard Material Requirements

Title: National Association of Corrosion Engineers, International, Test Method RP-0490, "Holiday Detection of Fusion Bonded Epoxy External Pipeline Coatings of 250 to 760 μm (10 to 30 mils)"
Location: NACE Book of Standards, Vol. 1, 1997, Standard Recommended Practices

Additional Information

The November 10, 2005 Memorandum was also based on experience gained during Dr. Hausler's career; specifically experience regarding failure analysis of coated tubulars (production tubing, pipelines) and with statistical methodologies, such as Extreme Value Statistics. For example:

Title: Blistered Coating from CO₂ Injection Wells; June 12, 1995, (Mobil Exploration and Producing Technical Center)
Document Date: June 12, 1995

Title: Paper presented at NACE CORROSION/96 No 96-0024: Corrosion management in the Arun Field
Document Date: March 1996