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10 CFR 50
10 CFR 51
10 CFR 54

2130-06-20284

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U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

Oyster Creek Generating Station
Facility Operating License No. DPR-16
NRC Docket No. 50-219

Subject: Commitments Associated with Containment (Drywell and Torus) Condition Monitoring Related to AmerGen Application for Renewed Operating License – Oyster Creek Generating Station (TAC No. MC7624)

- References:
1. Letter from C.N. Swenson (AmerGen Energy Company, LLC) to USNRC “Application for Renewed Operating License, Oyster Creek Generating Station,” dated July 22, 2005
 2. Letter 2130-05-20238 from C. N. Swenson to USNRC “Additional Commitments Associated with Application for Renewed Operating License – Oyster Creek Generating Station,” dated December 9, 2005

In Reference 1, AmerGen Energy Company, LLC (AmerGen) committed to manage the aging of the Oyster Creek Generating Station (OCGS) containment in accordance with its ASME Section XI, Subsection IWE Program. In Reference 2, AmerGen made a commitment to perform certain inspections of the Drywell shell in the sand bed region to confirm that actions previously taken have eliminated corrosion that had been occurring in that area of the Oyster Creek Generating Station (OCGS) primary containment.

AmerGen is now committing to perform additional actions to provide further assurance that the Drywell shell will remain capable of performing its design functions throughout the license renewal period. These prior and new commitments are collectively detailed in the attached Enclosure.

A new commitment is also made with regard to inspecting the coating material applied to the inside of the OCGS containment torus. This commitment is included in the listing provided in the Enclosure.

The above-described commitments will be specifically included as part of Commitment 27 from Table A.5 of Reference 1. Table A.5 contained the complete listing of Regulatory Commitments associated with the OCGS License Renewal Application. For completeness, Table A.5 will be re-submitted to the NRC under separate cover at a later date, capturing these and other commitments (unrelated to the Oyster Creek primary containment) made during the NRC's review of the OCGS License Renewal Application.

If you have any questions regarding this information, please contact Fred Polaski, Manager, License Renewal, at 610-765-5935.

I declare under penalty of perjury that the foregoing is true and correct.

Respectfully,

Executed on 04-09-06
Date


Michael P. Gallagher
Vice President, License Renewal Projects
AmerGen Energy Company, LLC

Enclosure: Regulatory Commitments

cc: Regional Administrator, USNRC Region I
NRC Project Manager, NRR - License Renewal, Safety
NRC Project Manager, NRR - License Renewal, Environmental, w/o Enclosure
NRC Project Manager, OCGS, Part 50
NRC Senior Resident Inspector, OCGS
Bureau of Nuclear Engineering, New Jersey Department of Environmental Protection
Oyster Creek File No. 05040

ENCLOSURE

REGULATORY COMMITMENTS

ENCLOSURE – REGULATORY COMMITMENTS

The following table identifies commitments made in this document. Any other actions discussed in the submittal represent intended or planned actions. They are described to the NRC for information and are not regulatory commitments.

Commitment	Committed Date or Outage	One-Time Action (Yes/No)	Programmatic (Yes/No)
<p>1. Prior to the period of extended operation, AmerGen will perform additional visual inspections of the epoxy coating that was applied to the exterior surface of the Drywell shell in the sand bed region, such that the coated surfaces in all 10 Drywell bays will have been inspected at least once. In addition, the Inservice Inspection (ISI) Program will be enhanced to require inspection of 100% of the epoxy coating every 10 years during the period of extended operation. These inspections will be performed in accordance with ASME Section XI, Subsection IWE. Performance of the inspections will be staggered such that at least three bays will be examined every other refueling outage.</p>	<p>Prior to period of extended operation and every ten years during the period of extended operation</p>	<p>No</p>	<p>Yes</p>
<p>2. Ultrasonic Testing (UT) thickness measurements of the drywell shell in the sand bed region will be performed on a frequency of every 10 years. The initial inspection will occur prior to the period of extended operation. The UT measurements will be taken from the inside of the drywell at the same locations where UT measurements were performed in 1996. The inspection results will be compared to previous results. Statistically significant deviations from the 1992, 1994, and 1996 UT results will result in corrective actions that include the following:</p> <ul style="list-style-type: none"> • Perform additional UT measurements to confirm the readings. • Notify NRC within 48 hours of confirmation of the identified condition. • Conduct visual inspection of the 	<p>Prior to period of extended operation and at 10-year intervals thereafter</p>	<p>No</p>	<p>Yes</p>

Commitment	Committed Date or Outage	One-Time Action (Yes/No)	Programmatic (Yes/No)
<p>external surface in the sand bed region in areas where any unexpected corrosion may be detected.</p> <ul style="list-style-type: none"> • Perform engineering evaluation to assess the extent of condition and to determine if additional inspections are required to assure drywell integrity. • Perform operability determination and justification for operation until next inspection. <p>These actions will be completed prior to restart from the associated outage.</p>			
<p>3. Consistent with current practice, a strippable coating will be applied to the reactor cavity liner to prevent water intrusion into the gap between the drywell shield wall and the drywell shell during periods when the reactor cavity is flooded.</p>	<p>Refueling outages prior to and during the period of extended operation</p>	<p>No</p>	<p>Yes</p>
<p>4. The reactor cavity seal leakage trough drains and the drywell sand bed region drains will be monitored for water leakage.</p>	<p>Periodically</p>	<p>No</p>	<p>Yes</p>
<p>5. A visual examination of the drywell shell in the drywell floor inspection access trenches will be performed to assure that the drywell steel remains intact. If degradation is identified, the drywell shell condition will be evaluated and corrective actions taken as necessary. These surfaces will either be inspected as part of the scope of the ASME Section XI, Subsection IWE inspection program or they will be restored to the original design configuration using concrete or other suitable material to prevent moisture collection in these areas.</p>	<p>Prior to the period of extended operation</p>	<p>Yes, if equipment restored to original configuration.</p>	<p>Yes, if maintained within IWE Inspection Program</p>
<p>6. The coating inside the torus will be visually inspected in accordance with ASME Section XI, Subsection IWE, per the Protective Coatings Program.</p>	<p>Every other refueling outage prior to and during the period of extended operation</p>	<p>No</p>	<p>Yes</p>

Commitment	Committed Date or Outage	One-Time Action (Yes/No)	Programmatic (Yes/No)
7. AmerGen will conduct UT thickness measurements in the upper regions of the drywell shell every other refueling outage at the same locations as are currently measured.	Every other refueling outage prior to and during the period of extended operation	No	Yes