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

**Subject: Oyster Creek Generating Station  
Facility License No. DPR-16  
Docket No. 50-219  
Alternative Repair of Control Rod Drive Housing Interface with Reactor Vessel  
Clarification of Leakage Inspection**

- References:**
1. AmerGen letter No. 2130-00-20300 dated November 10, 2000, "Alternative Repair of Control Rod Drive Housing Interface with Reactor Vessel"
  2. NRC letter dated November 16, 2000, "Request to Use an Alternative Repair of the Control Rod Drive Housing Interface with the Reactor Vessel at the Oyster Creek Nuclear Generating Station (TAC No. MB0461)"

As discussed in Reference 1, AmerGen Energy Co., LLC (AmerGen) requested NRC approval of an alternative repair to two leaking control rod drive (CRD) housings. NRC approved the request in Reference 2. As discussed in the attachment to Reference 1, it was stated on page 7 in the section entitled "Penetration Leakage Acceptance Limits" that the leakage limits contained in BWRVIP-17, "Roll/Expansion Repair of Control Rod Drive and In-Core Instrument Penetrations in BWR Vessels," will be followed. AmerGen reiterates that those leakage limits and the resulting action required when a limit is exceeded will be followed. The purpose of this letter is to clarify the conditions under which the leakage inspections will be initiated and what limits should apply.

The CRD housing leakage limits specified in BWRVIP-17 are dependent upon the length of the outage when the leakage inspections are performed. Certain leakage limits apply when the outage is less than 7 days (Table 2-3). Other leakage limits apply when the outage is greater than 7 days (Table 2-4). Since the tables do not address what limits should apply if the outage is planned for a nominal duration of 7 days, AmerGen will apply the leakage limits of Table 2-3 if the planned outage duration is 7 days or less.

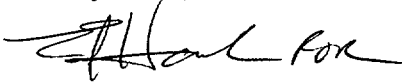
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The heading on Table 2-3 in BWRVIP-17 refers to leakage limits for inspections during forced outages of less than 7 days. AmerGen believes the leakage limits in Table 2-3 should apply to inspections during outages of opportunity of 7 days or less whether they are scheduled or forced. In addition, the leakage limits of Table 2-3 would still remain applicable if a scheduled or forced outage is initially planned for 7 days or less and is subsequently extended due to unforeseen or emerging circumstances.

AmerGen intends to perform the CRD housing leakage inspection only if there is otherwise a need to enter the drywell during an outage regardless of outage length. This helps to avoid drywell entries soon after a plant shutdown that would result in increased occupational dose. If there is no plan to enter the drywell and perform a CRD leakage inspection during outages greater than 7 days, then AmerGen will notify the NRC of the basis for not performing the inspection.

If you should have any additional questions or require any additional information, please contact Mr. George B. Rombold at 610-765-5516.

Very truly yours,



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Vice President  
Oyster Creek

c: H. J. Miller, Administrator, USNRC Region I  
L. A. Dudes, USNRC Oyster Creek Senior Resident Inspector  
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