

AmerGen Energy Company, LLC
Oyster Creek
US Route 9 South
P.O. Box 388
Forked River, NJ 08731-0388

10 CFR 50.90

August 8, 2001
2130-01-20170

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

Subject: Oyster Creek Generating Station
Facility Operating License No. DPR-16
Docket No. 50-219
Emergency Technical Specification Change Request No. 302
Additional Information

Reference: AmerGen Letter No. 2130-01-20169 to the USNRC dated August 6, 2001,
"Emergency Technical Specification Change Request No. 302"

AmerGen Energy Company, LLC (AmerGen) requested an emergency change to Oyster Creek Generating Station (Oyster Creek) Technical Specification (TS) 3.4.C.3 in the referenced letter. As a result of further review by AmerGen and review by the NRC staff, additional information in two areas have been identified to allow completion of the staff's review.

The first area involves a statement in Enclosure 1 of the above reference wherein it was stated in the second full paragraph on page 4 that both emergency service water (ESW) loops are at Maintenance Rule level (a)(2). This statement is incorrect since the ESW System is at Maintenance Rule level (a)(1). The two-year unavailability charts and tables show that system unavailability is not approaching (a)(1) unavailability limits for either loop. The team evaluating system reliability considered only the charts and incorrectly concluded that the system was not (a)(1). However, the Maintenance Rule monitors systems for unavailability and reliability. The ESW system has been (a)(1) since 1999 due to previous functional failures of the ESW pumps for which corrective actions have been taken. The success of the corrective measures is being monitored over the course of about 14 months at which time (October 2001), depending on the continued good performance of the ESW pumps, the ESW System is targeted to return to (a)(2) status. AmerGen regrets the error in the reference letter as the reviews conducted prior to submitting the letter did not identify it.

The second area pertains to information regarding the applicable Code requirements for the replacement ESW loop II piping. The information below identifies the Code requirements applicable to the piping.

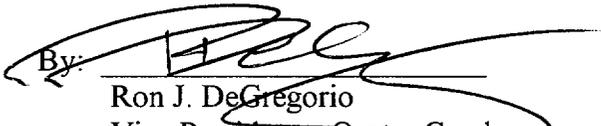
A045

The new replacement spool pieces are considered as a Section XI "Repair/Replacement" for which the original construction code (ASA B31.1- 1955) shall apply for Fabrication, Welding, Inspection and Hydrostatic Testing. Use of B31.1-1989 for Fabrication, Welding, Inspection and Hydrostatic Testing in lieu of the 1955 version is acceptable for this Section XI "Repair/Replacement" as discussed in the following reconciliation:

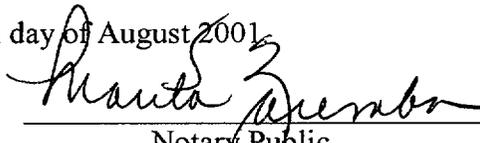
- ◆ There is no significant difference in fabrication and welding requirements for 14 inch nominal diameter carbon steel piping or fittings in the 1989 version versus the 1955 version of B31.1.
- ◆ Welder qualification requirements are more comprehensive in B31.1-1989.
- ◆ The 1989 version of B31.1 provides more comprehensive inspection criteria for than the 1955 version
- ◆ A comparison of B31.1 – 1989 with the 1955 version for leak-testing requirements indicates no significant difference.

If any additional information is needed, please contact Paul Czaya at (609) 971-4139.

All statements contained in this submittal have been reviewed, and all such statements made and matters set forth therein are true and correct to the best of my knowledge.

By: 
Ron J. DeGregorio
Vice President – Oyster Creek

Sworn to and subscribed before me this 8th day of August 2001


Notary Public

MARITA ZAREMBA
NOTARY PUBLIC OF NEW JERSEY
Commission Expires 5/31/2005

- c: H. J. Miller, Administrator, USNRC Region I
T. G. Colburn, USNRC Senior Project Manager, Oyster Creek (Acting)
L. A. Dudes, USNRC Senior Resident Inspector, Oyster Creek
File No. 01074