

AmerGen Energy Company, LLC
Oyster Creek
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10 CFR 50.55a

September 13, 2001
2130-01-20187

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

Subject: Oyster Creek Generating Station
Docket No. 50-219
Facility Operating License No. DPR-16
ISI Code Request No. 27

AmerGen Energy Company, LLC (AmerGen) proposes an alternative to one of the requirements contained in ASME Section XI. This alternative concerns an extension to the current 10-year interval and approval is requested pursuant to 10 CFR 50.55a(a)(3)(i). AmerGen requests approval of the enclosed alternative request by May 30, 2002 to support planning for the next refueling outage currently scheduled for mid-October 2002.

Should you have any questions or require any additional information please contact Mr. Paul F. Czaya at 609-971-4139.

Very truly yours,



Ron J. DeGregorio
Vice President
Oyster Creek

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c: H. J. Miller, Administrator, USNRC Region I
L. A. Dudes, USNRC Senior Resident Inspector, Oyster Creek
H. N. Pastis, USNRC Senior Project Manager, Oyster Creek
File No. 01042

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**OYSTER CREEK GENERATING STATION
ISI CODE REQUEST NO. 27
REGARDING EXTENDING THE THIRD TEN YEAR INTERVAL**

COMPONENT IDENTIFICATION

Code Class: Class 1, Class 2, and Class 3

Reference: ASME Section XI, 1986 Edition, IWA-2430(d)

Examination Categories: See Table 1

Item Number: See Table 1

Description: Inspection Interval

Component Classifications: Class 1, Class 2, and Class 3 Pressure Retaining Components

CODE REQUIREMENTS

ASME Boiler and Pressure Vessel Code (Code), Section XI, “Rules for Inservice Inspection of Nuclear Power Plant Components,” 1986 Edition, Subarticle IWA-2430(d), allows each of the inspection intervals for Program B components to be increased or decreased by as much as 1 year. Adjustments shall not cause successive intervals to be altered by more than 1 year from the original pattern of intervals.

CODE REQUIREMENTS FOR WHICH AN ALTERNATIVE IS REQUESTED

AmerGen requests a one-time 90-day extension to the one (1) year adjustment in IWA-2430(d) for the examinations of approximately 80 components identified in Table 1. This one-time 90-day extension will allow the completion of the component examinations during the next refueling outage (1R19), which is scheduled to begin in mid-October, 2002. The third interval is scheduled to end on October 14, 2002. The interval end date comes prior to the current planned start of the 1R19 outage.

BASIS FOR ALTERNATIVE

Pursuant to 10 CFR 50.55a(a)(3)(i), an alternative is requested on the basis that the one-time 90-day extension to the one (1) year adjustment in IWA-2430(d) for the examinations of

approximately 80 components will provide an acceptable level of quality and safety. In accordance with the 1986 Edition of Code Section XI, the third inspection interval is scheduled to conclude on October 14, 2002. This includes the one (1) year adjustment to the third interval as permitted in IWA-2430(d). Oyster Creek refueling outage 1R19 has been rescheduled to mid-October, 2002. This refueling outage was originally scheduled to begin in September 2002. The September 2002 schedule would have allowed for all examinations to be completed by the end of the inspection interval. The decision to re-schedule the Oyster Creek outage was based on the need to maximize Exelon/AmerGen resources dedicated to the Peach Bottom Unit 2 and Oyster Creek refueling outages, which are scheduled for the Fall of 2002. Therefore, an additional 90-day interval extension is requested for the examinations of the components.

Table 1 lists the examinations. A review of the examination history for the current interval of those components in the same Examination Categories and Item Numbers as the components described in Table 1 shows that all components passed the inspections. Therefore, an additional one-time 90-day extension to the one (1) year adjustment will not impact the level of quality and safety of the components because the requested 90-day extension is of relatively short duration and the examination history of similar components does not indicate any structural integrity concerns.

This extension will not affect the inspection frequency of future inspection intervals. The fourth inspection interval will commence on October 15, 2002, as scheduled, and all fourth interval inspections will not be impacted by this 90-day extension. The third ten-year inspection interval is scheduled to end on October 14, 2002 prior to the start of refueling outage 1R19. The components remaining to be examined will only be in operation for a brief period of time beyond the interval end date. The one-time 90-day extension will allow ample time to perform inspections on the components during the outage in the third inspection interval.

As an additional benefit in extending the interval, commencing the outage in mid-October improves cooling system efficiency due to lower heat sink temperature. Also, better cooling system effectiveness and the generally lower ambient temperature experienced in October versus September improves working conditions in the reactor building and primary containment increasing worker effectiveness. Improving worker effectiveness can result in lower worker dose.

ALTERNATIVE PROVISIONS

The approximately 80 components that remain to be inspected during the current third ten-year interval will be examined by the end of refueling outage 1R19 scheduled to begin in mid-October 2002. These examinations will apply to the third inspection interval only and will not be simultaneously credited to the fourth inspection interval that will commence on October 15,

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2002. At the start of the fourth interval, all repairs and replacements for components other than the approximately 80 scheduled for examination shall be conducted in accordance with the rules of the Code selected for the fourth interval.

PERIOD FOR WHICH ALTERNATIVE IS REQUESTED

This alternative is requested for the examinations of approximately 80 components listed in Table 1 to satisfy the requirements of the third inspection interval.

Table 1
ISI Scope for Refueling Outage 1R19

Classification	Category	Item No.	Quantity	Description
Class 1	B-D	B3.90 B3.100	1	CRDR Nozzle to Vessel Weld ISI and NUREG-0619
	B-F	B5.10	4	Nozzle to Safe-ends: 1 – Control Rod Drive Return; 2 – Isolation Condenser; 1 - Liquid Poison
	B-J	B9.11 B9.21 B9.32 B9.40	31	Piping Welds
	B-G-1	B6.10 B6.21 B6.40 B6.50	20	Reactor Vessel Head Bolts
	B-N-1 B-N-2	B13.11 B13.20 B13.30 B13.40	Note	Reactor Vessel Internal
	B-O	B14.10	2	Weld to Control Rod Drive Housing
Class 2	C-A	C1.30	1	Containment Spray Heat Exchanger Flange to Shell Weld
	C-C	C3.20	2	Integral Attachments
	C-F-1	C5.11	3	Welds Follow-up from 1R18 Refueling Outage
Class 3	D-C	D3.20	2	Integral Attachments
IWF	F-A	F1.10 F1.20 F1.30 F1.40	14	Component Supports

Note: General vessel visual inspection and core support inspection as accessible concurrent with other inspections.