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An Exelon/British Energy Company

10CFR50.55a

April 19, 2002

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: Submittal of Proposed Alternative and Relief to the Requirements of
10CFR50.55a Concerning the Fourth Ten-Year Interval Inservice
Testing Program

Dear Sir/Madam:

Attached for your review and approval are a proposed alternative and relief in accordance with 10CFR50.55a, associated with the Fourth Ten-Year Interval Inservice Testing (IST) Program for Oyster Creek Generating Station (OCGS). Based on a start date of October 14, 2002, the OCGS IST Program is required by 10CFR50.55a(f)(4) to comply with the requirements of the ASME OM Code-1995, Code for Operation and Maintenance of Nuclear Power Plants, including the OMA-1996 Addenda.

The Third Ten-Year Interval began on October 14, 1991, and will conclude by October 13, 2002. The Fourth Ten-Year Interval will begin on October 14, 2002, and conclude on October 13, 2012.

We request your review and approval by October 1, 2002.

If you have any questions or require additional information, please do not hesitate to contact us.

Very truly yours,



Michael P. Gallagher
Director, Licensing & Regulatory Affairs
Mid-Atlantic Regional Operating Group

Attachment 1 - Oyster Creek Generating Station Proposed Alternative and Relief Request

cc: H. J. Miller, Administrator, USNRC, Region I (w/attachment)
L. Dudes, USNRC Senior Resident Inspector, LGS (w/attachment)
P. S. Tam, Senior Project Manager, USNRC (w/attachment)

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ATTACHMENT 1

OYSTER CREEK GENERATING STATION
PROPOSED ALTERNATIVE AND RELIEF REQUEST
FOURTH TEN-YEAR INTERVAL

PROPOSED ALTERNATIVE

RP-04

PROPOSED RELIEF

RV-51

RP-04

SYSTEM: Service Water

PUMPS: Service Water P-3-1A (1-1)
P-3-1B (1-2)

CATEGORY: Group A

FUNCTION: Suction pressure gages for above pumps.

TEST REQUIREMENT: Paragraph ISTB 4.7.1(b)(1) requires that the full-scale range of each analog instrument be not greater than three times the reference value.

BASIS FOR RELIEF: The Service Water Suction Pressure instruments (PI-533-1173, 1172) are permanently installed instruments with a full scale range that exceeds three times the reference value as specified by the Code. Although these instruments do not meet Code requirements, they provide the same or better indication accuracy at the reference value than that which is permitted by the Code.

For instruments to be in compliance with the Code, they must be calibrated to an accuracy of $\pm 2\%$ of full scale range, and have a full scale range no greater than three times the reference value. The combination of the two requirements (i.e. accuracy equal to $\pm 2\%$ of full-scale and full scale being up to 3 times the reference value) yields a permissible inaccuracy of $\pm 6\%$ of the reference value. Section 5.5.1 of NUREG 1482 states that the staff will grant relief when the combination of the range and accuracy yields a reading at least equivalent to the reading achieved from instruments that meet the Code requirements (i.e., up to ± 6 percent).

The table below shows the instrument accuracy and full scale range of the suction pressure instruments used to conduct inservice testing of the Service Water pumps. The resulting instrument tolerance and indicated accuracy are calculated and also listed in the Table. In both cases, the indicated accuracy at the reference value is shown to be within the required 6 percent. Replacement of the existing instruments with Code compliant instruments provides no safety benefit and could actually lessen the accuracy of the test results. A similar relief request for these instruments was approved in the Safety Evaluation Report contained in the letter from J. F. Stolz (NRC) to J. J. Barton (GPU)

Nuclear Corporation), dated August 24, 1993 for Oyster Creek Generating Station. Additionally, a similar request was approved for Limerick Generating Station, Units 1 and 2, in the Safety Evaluation Report contained in the letter from J. W. Clifford (NRC) to J. A. Hutton (PECO Energy Company), dated November 28, 2000.

SYSTEM	INSTRUMENT NUMBER	REFERENCE VALUE	INSTRUMENT RANGE	INSTRUMENT ACCURACY	INSTRUMENT TOLERANCE	INDICATED ACCURACY
533	PI-533-1172	2.3	0 - 10 psig	± 1%	± 0.1 psig	4.35%
533	PI-533-1173	2.2	0 - 10 psig	± 1%	± 0.1 psig	4.55%

ALTERNATE TESTING: Based on Section 5.5.1 of NUREG 1482 and the information provided herein, the existing permanently installed pump instrumentation is considered acceptable in meeting the intent of the Code. No alternate testing will be performed. Accordingly, this alternative is being requested in accordance with 10CFR50.55a(a)(3)(i) in that the proposed alternative provides an acceptable level of quality and safety.

RV-51

SYSTEMS:

Main Steam
Reactor Building Closed Cooling Water
Instrument Air
Reactor Water Cleanup
Drywell Floor and Equipment Drains
Containment Inerting
Reactor Building Ventilation
Reactor Head Cooling

Valves:

V-1-7	V-22-1	V-23-20
V-1-8	V-22-2	V-23-21
V-1-9	V-22-28	V-23-22
V-1-10	V-22-29	V-27-1
V-5-147	V-23-13	V-27-2
V-5-166	V-23-14	V-27-3
V-5-167	V-23-15	V-27-4
V-6-395	V-23-16	V-28-17
V-16-1	V-23-17	V-28-18
V-16-2	V-23-18	V-28-47
V-16-14	V-23-19	V-31-2
V-16-61		

CATEGORY:

A

FUNCTION:

Containment Isolation Valves

TEST REQUIREMENT:

ISTC 4.1. Valves with remote position indicators shall be observed at least once every two years to verify that valve operation is accurately indicated.

BASIS FOR RELIEF:

Pursuant to 10CFR50.55a(f)(6)(i), AmerGen Energy Company, LLC, is requesting relief in that the radiation doses make it impractical to perform the inservice testing as required in the code. The above valves are located in radiation areas. Local observation to verify the accuracy of the position indicators will result in unnecessary radiation exposure. Alternate means can be used to verify accurate position indication. A similar relief request for these isolation valves was approved in the Safety Evaluation Report contained in the letter from J. F. Stolz (NRC) to J. J. Barton (GPU Nuclear Corporation), dated September 24, 1992 for the Oyster Creek Generating Station, third interval inservice testing program.

ALTERNATE TESTING: The position indicators for the above valves will be verified at least once every 2 years. In lieu of local observation, the following method will be used to verify accurate position indication. Proper system operation will verify accurate open position indication and successful leak rate test results will verify accurate closed indication.