

AmerGen Energy Company, LLC
200 Exelon Way
Suite 345
Kennett Square, PA 19348

www.exeloncorp.com

An Exelon/British Energy Company

10CFR50.55a

April 26, 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: Proposed Alternative to the Requirements of 10CFR50.55a Concerning
the Fourth Ten-Year Interval Inservice Inspection Program Snubber
Examination and Testing

Dear Sir/Madam:

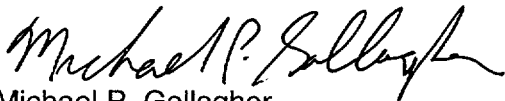
Attached for your review and approval is a proposed alternative in accordance with 10CFR50.55a, associated with the Fourth Ten-Year Interval Inservice Inspection (ISI) Program for Oyster Creek Generating Station (OCGS). Based on a start date of October 15, 2002, the OCGS ISI Program is required by 10CFR50.55a(g)(4) to comply with the requirements of the 1995 Edition (with 1996 Addenda) of the ASME, Section XI Code. This alternative is the first associated with the Fourth Ten-Year Interval Inservice Inspection (ISI) Program for OCGS.

The third Ten-Year interval began on March 15, 1992, and will conclude on October 14, 2002. The fourth Ten-Year Interval will begin on October 15, 2002.

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 - Oyster Creek Generating Station Proposed Alternative

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

A047

SNUBBER ALTERNATIVE

I. IDENTIFICATION OF COMPONENTS

Code Class:	ASME Class 1, 2, and 3 snubber assemblies.
Reference:	ASME Section XI, Subsection IWF
Examination Category:	F-A
Item Numbers:	F1.10 through F1.40
Description:	This relief is applicable to the snubber assembly only, which includes, the snubber body and attachments out to and including the load pins and their retainers.

II. CODE REQUIREMENTS FROM WHICH AN ALTERNATIVE IS REQUESTED

The 1995 Edition (with 1996 Addenda) of ASME, Section XI, Subsection IWF provides requirements for the inspection of Class 1, 2, 3 and MC component supports. Article IWF-5000 provides the inservice examination and testing requirements for snubbers. Paragraph IWF-5300(a) specifies that inservice examinations shall be performed in accordance with the first Addenda to ASME/ANSI OM-1987, Part 4 (OMa-1988) using the VT-3 visual examination method in IWA-2213. IWF-5300(b) specifies that inservice tests shall be performed in accordance with the first Addenda to ASME/ANSI OM-1987, Part 4 (OMa-1988).

Pursuant to 10CFR50.55a(a)(3)(i), an alternative is requested to perform snubber examinations and tests in accordance with the requirements of Oyster Creek Technical Specifications (TS) 3.5.A.8 & 4.5.M on the basis that the proposed alternative provides an acceptable level of quality and safety.

III. BASIS FOR ALTERNATIVE

Oyster Creek Technical Specifications (TS) 3.5.A.8 & 4.5.M establish the surveillance requirements for snubbers. The TS snubber visual examination program inspects safety related snubbers and incorporates the alternate snubber visual examination requirements delineated in USNRC Generic Letter (GL) 90-09, "Alternate Requirements for Snubber Visual Inspection Intervals and Corrective Actions." The implementation of GL 90-09 visual inspection program requirements was evaluated and approved in the Safety Evaluation Report contained

in the letter from Mr. A. W. Dromerick (NRC) to J. J. Barton (GPU Nuclear Corporation), dated September 6, 1995. The TS functional testing program is based on NRC Generic Letter dated March 23, 1981. The requirements of this program were evaluated and approved in the Safety Evaluation Report contained in the letter from Mr. J. A. Zwolinski (NRC) to Mr. P. B. Fiedler (GPU Nuclear Corporation), dated March 31, 1986.

The purpose of the Snubber Inspection and Test Program described in OCGS TS 3.5.A.8 & 4.5.M is to assure and demonstrate operational readiness and structural integrity of snubbers through testing and examination. The examination criteria for snubbers from pin-connection to pin-connection meet this objective. The Oyster Creek Inservice Inspection (ISI) Program also requires VT-3 visual examinations of a sample of snubbers in accordance with Article IWF-2000 and Table IWF-2500-1, Examination Category F-A. Additionally, VT-3 visual examinations are performed following re-installation of snubbers removed for functional testing or maintenance activities, per IWF-5400.

OCGS has procedures in place to implement the program as described in the Technical Specifications 3.5.A.8 & 4.5.M. The examinations are performed by personnel qualified in accordance with ASME Section XI. Based on the above discussion, OCGS has determined that implementation of Technical Specifications 3.5.A.8 & 4.5.M will assure an acceptable level of quality and safety.

IV. ALTERNATE PROVISIONS

Functional testing and examination of snubber assemblies from pin-connection to pin-connection at OCGS will be performed in accordance with Technical Specifications 3.5.A.8 & 4.5.M. These examinations and functional tests will be performed in lieu of the inspection and testing requirements of IWF-5000. The general requirements of Subsection IWA for examination methods and personnel qualifications still apply.

V. APPLICABLE TIME PERIOD

Relief is requested for the Fourth Ten-Year Interval for the OCGS, beginning October 15, 2002.