October 2, 2002

Mr. John L. Skolds, President
and Chief Nuclear Officer
Exelon Nuclear
Exelon Generation Company, LLC
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: OYSTER CREEK NUCLEAR GENERATING STATION - ALTERNATIVE REGARDING SNUBBER EXAMINATION AND TESTING (TAC NO. MB4995)

Dear Mr. Skolds:

By letter dated April 26, 2002, AmerGen Energy Company, LLC, requested relief from the requirements of the 1995 Edition (with 1996 Addenda) of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," Article IWF-5000, for Oyster Creek Nuclear Generating Station (OCNGS), with regard to visual examination and functional testing of snubbers. AmerGen proposed an alternative to these requirements.

The Nuclear Regulatory Commission (NRC) staff reviewed the proposed alternative. The results are provided in the enclosed safety evaluation. The NRC staff determined that AmerGen has presented an adequate justification for relief from the requirements of the ASME Code, 1995 Edition (with 1996 Addenda), Section XI, Article IWF-5000, which references the first Addenda to OM-1987, Part 4, with regard to the visual examination and functional testing of ASME Class 1, 2, and 3 snubber assemblies at OCNGS. The NRC staff determined that the proposed use of the OCNGS Technical Specification requirements as an alternative for snubber activities would provide an acceptable level of quality and safety. Therefore, pursuant to 10 CFR 50.55a(a)(3)(i), AmerGen's proposed alternative for the fourth 10-year interval of the OCNGS snubber ISI program is authorized.

Sincerely,

/RA/

Richard J. Laufer, Chief, Section 1
Project Directorate 1
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-219

Enclosure: Safety Evaluation

cc w/encl: See next page

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Docket Nos. 50-219
Enclosure: Safety Evaluation
cc w/encl: See next page
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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

ALTERNATIVE FOR SNUBBER INSERVICE INSPECTION PROGRAM

AMERGEN ENERGY COMPANY, LLC

OYSTER CREEK GENERATING STATION

DOCKET NO. 50-219

1.0 INTRODUCTION

By letter dated April 26, 2002, AmerGen Energy Company, LLC (AmerGen, the licensee), requested relief from the requirements of the 1995 Edition (with 1996 Addenda) of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," Article IWF-5000, for Oyster Creek Nuclear Generating Station (OCNGS), with regard to visual examination and functional testing of snubbers. Article IWF-5000 references the first Addenda to ASME/American National Standards Institute (ANSI) OM-1987, Part 4 (OMa-4) for such snubber activities.

2.0 REGULATORY EVALUATION

Inservice inspection (ISI) of ASME Code Class 1, 2, and 3 components is to be performed in accordance with Section XI of the ASME Code and applicable addenda as required by Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.55a(g), except where specific written relief has been granted by the Nuclear Regulatory Commission (NRC) pursuant to 10 CFR 50.55a(g)(6)(i). Section 50.55a(a)(3) states that alternatives to the requirements of paragraph (g) may be used, when authorized by the NRC, if: (i) the proposed alternatives would provide an acceptable level of quality and safety, or (ii) compliance with the specified requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

Pursuant to 10 CFR 50.55a(g)(4), ASME Code Class 1, 2, and 3 components (including supports) will meet the requirements, except the design and access provisions and the preservice examination requirements, set forth in the ASME Code, Section XI, to the extent practical within the limitations of design, geometry, and materials of construction of the components. The regulations require that inservice examination of components and system pressure tests conducted during the first 10-year interval and subsequent intervals comply with the requirements in the latest edition and addenda of Section XI of the ASME Code incorporated by reference in 10 CFR 50.55a(b), 12 months prior to the start of the 120-month interval, subject to the limitations and modifications listed therein. The applicable edition of Section XI of the ASME Code for the OCNGS fourth 10-year ISI inspection interval is the 1995 Edition, with 1996 Addenda.

Pursuant to 10 CFR 50.55a(g)(5), if AmerGen determines that conformance with an examination requirement of Section XI of the ASME Code is not practical for its facility, information will be submitted to the Commission in support of that determination and a request must be made for relief from the ASME Code requirement. After evaluation of the determination, pursuant to 10 CFR 50.55a(g)(6)(i), the Commission may grant relief and/or may impose alternative requirements that are determined to be authorized by law, will not endanger life, property, or the common defense and security, and are otherwise in the public interest, giving due consideration to the burden upon the licensee that could result if the requirements were imposed.

3.0 TECHNICAL EVALUATION

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

Pursuant to 10 CFR 50.55a(a)(3)(i), AmerGen proposed an alternative to perform snubber examinations and tests in accordance with the requirements of OCNGS Technical Specifications (TSs), Subsection 3.5.A.8 & 4.5.M, on the basis that the proposed alternative provides an acceptable level of quality and safety.

AmerGen stated in its application that OCNGS TSs, Subsections 3.5.A.8 & 4.5.M, establish the surveillance requirements for snubbers. The TSs snubber visual examination program requires the inspection of safety-related snubbers and incorporates the alternate snubber visual examination requirements delineated in Generic Letter (GL) 90-09, “Alternate Requirements for Snubber Visual Inspection Intervals and Corrective Actions,” dated December 11, 1990. The implementation of GL 90-09 visual inspection requirements was evaluated and approved in an NRC Safety Evaluation (SE) dated September 6, 1995. The OCNGS TSs functional testing program is based on the model TS included in the NRC’s letter dated March 23, 1981. The requirements specified in this program were evaluated and approved in the NRC’s SE March 31, 1986.

AmerGen stated that the purpose of the snubber inspection and test program described in TSs Subsection 3.5.A.8 & 4.5.M is to assure and demonstrate operational readiness and structural integrity of snubbers through functional testing and visual examination. The examination criteria for snubbers, pin to pin, meet this objective. As an added assurance, the OCNGS 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, in accordance with IWF-5400.

AmerGen stated that Oyster Creek has procedures in place to implement the program as described in TSs Subsection 3.5.A.8 & 4.5.M. The examinations are performed by personnel qualified in accordance with ASME Section XI.

Based on the above evaluation, the NRC staff determined that snubber visual examinations and functional testing, conducted in accordance with the OCNGS TSs, would provide an acceptable level of quality and safety, and is, therefore, acceptable.

4.0 CONCLUSION

Based on the information provided by the licensee, the NRC staff determined that the licensee has presented an adequate justification for relief from the requirements of the ASME Code, 1995 Edition (with 1996 Addenda), Section XI, Article IWF-5000, which references the first Addenda to OM-1987, Part 4, with regard to the visual examination and functional testing of ASME Class 1, 2, and 3 snubber assemblies at OCNGS. The NRC staff determined that the proposed use of the OCNGS TSs requirements as an alternative for snubber activities would provide an acceptable level of quality and safety. Therefore, pursuant to 10 CFR 50.55a(a)(3)(i), AmerGen's proposed alternative for the fourth 10-year interval of the OCNGS snubber ISI program is authorized.

Principal Contributor: A. Lee

Date: October 2, 2002

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