

10 CFR 50.90

2130-03-20276  
March 23, 2004United States Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555-0001**SUBJECT:** Oyster Creek Generating Station  
Facility Operating License No. DPR-16  
NRC Docket No. 50-219Technical Specification Change Request 321-To Eliminate Requirements for  
Hydrogen/Oxygen Monitors Using The Consolidated Line Item Improvement  
Process**REFERENCES:** Technical Specification Task Force (TSTF) Standard Technical Specifications  
Change Traveler TSTF-447, Revision 1, "Elimination of Hydrogen  
Recombiners and Change to Hydrogen and Oxygen Monitors"Federal Register, Volume 68, Number 186, Notice of Availability of Model  
Application Concerning Technical Specification Improvement to Eliminate  
Hydrogen Recombiner Requirement, and Relax the Hydrogen and Oxygen  
Monitor Requirements for Light Water Reactors Using the Consolidated Line  
Item Improvement Process, published September 25, 2003, (68FR55416).

In accordance with 10 CFR 50.90, "Application for Amendment of License or Construction Permit," AmerGen Energy Company, LLC proposes changes to Appendix A, Technical Specifications (TS) for the Oyster Creek Generating Station. The purpose of this license amendment request is to eliminate the requirements for hydrogen/oxygen monitors from the Technical Specifications. The proposed Technical Specification changes support implementation of the revisions to 10 CFR 50.44, "Standards for Combustible Gas Control System in Light-Water-Cooled Power Reactors," that became effective on October 16, 2003.

The proposed changes are consistent with Revision 1 of NRC-approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-447, "Elimination of Hydrogen Recombiners and Change to Hydrogen and Oxygen Monitors." The availability of this TS improvement was announced in the Federal Register on September 25, 2003 as part of the Consolidated Line Item Improvement Process (CLIP).

Enclosure 1 provides a description of the proposed change, the requested confirmation of applicability, and plant-specific verifications and commitments. Enclosure 2 provides the existing TS pages marked-up to show the proposed change. Enclosure 3 provides retyped TS pages with the proposed changes incorporated and Enclosure 4 provides a list of regulatory commitments made in this correspondence.

A001

AmerGen Energy Company, LLC requests approval of the proposed changes by September 30, 2004, with the amendment being implemented within 60 days of issuance.

The proposed changes have been reviewed by the Plant Operations Review Committee and approved by the Nuclear Safety Review Board in accordance with the Section 6.5 of the Oyster Creek Technical Specifications.

In accordance with 10 CFR 50.91, "Notice for public comment; State consultation," paragraph (b), AmerGen Energy Company, LLC is notifying the State of New Jersey of this application for changes to the TS by transmitting a copy of this letter and its attachments to the designated State Official.

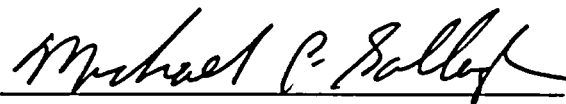
If you have any questions or require additional information, please contact Dave Robillard at (610) 765- 5952.

I declare under penalty of perjury that the foregoing is true and correct.

Respectfully,

Executed on

03-23-04



Michael P. Gallagher  
Director, Licensing and Regulatory Affairs  
AmerGen Energy Company, LLC

- Enclosures: 1) Description and Assessment of Proposed Changes  
2) Proposed Technical Specification Changes (Mark-up)  
3) Retyped Technical Specification Pages  
4) List of Regulatory Commitments

cc: H. J. Miller, Administrator, Region I, USNRC  
R. J. Summers, USNRC Senior Resident Inspector, OCGS  
P. S. Tam, Project Manager, USNRC  
File No. 03094

**ENCLOSURE 1**

**Oyster Creek Technical Specification Change Request No. 321**

**Description and Assessment of Proposed Changes**

## 1.0 INTRODUCTION

In accordance with 10 CFR 50.90, "Application for Amendment of License or Construction Permit," AmerGen Energy Company, LLC proposes changes to Appendix A, Technical Specifications (TS), for the Oyster Creek Generating Station. The purpose of this license amendment request is to eliminate the requirements for hydrogen/oxygen monitors from the Technical Specifications. The proposed Technical Specification changes support implementation of the revisions to 10 CFR 50.44, "Standards for Combustible Gas Control System in Light-Water-Cooled Power Reactors," that became effective on October 16, 2003.

The proposed changes are consistent with Revision 1 of NRC-approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-447, "Elimination of Hydrogen Recombiners and Change to Hydrogen and Oxygen Monitors." The availability of this TS improvement was announced in the Federal Register on September 25, 2003 as part of the Consolidated Line Item Improvement Process (CLIIP).

## 2.0 DESCRIPTION OF PROPOSED AMENDMENT

Consistent with the NRC-approved Revision 1, of TSTF-447, the proposed TS changes include:

TS Section 3.13.F	Drywell H <sub>2</sub> Monitor	Deleted
Table 3.13.1	Item 4, Drywell H <sub>2</sub> Monitor	Deleted
TS Section 4.13.D	Drywell H <sub>2</sub> Monitor	Deleted
Table 4.13-1	Item 4, Drywell H <sub>2</sub> Monitor	Deleted

Other TS changes included in this application are limited to formatting changes that resulted directly from the deletion of the above requirements related to Hydrogen Monitors.

## 3.0 BACKGROUND

The background for this application is adequately addressed by the NRC Notice of Availability published on September 25, 2003 (68FR55416), TSTF-447, the documentation associated with the 10 CFR 50.44 rulemaking, and other related documents.

#### 4.0 REGULATORY REQUIREMENTS AND GUIDANCE

The applicable regulatory requirements and guidance associated with this application are adequately addressed by the NRC Notice of Availability published on September 25, 2003 (68FR55416), TSTF-447, the documentation associated with the 10 CFR 50.44 rulemaking, and other related documents.

#### 5.0 TECHNICAL ANALYSIS

AmerGen Energy Company, LLC has reviewed the safety evaluation published on September 25, 2003 (68FR55416) as part of the CLIIP. This verification included a review of the NRC staff's Safety Evaluation, as well as the supporting information provided to support TSTF-447. AmerGen Energy Company, LLC has concluded the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to the Oyster Creek Generating Station and justify this amendment for the incorporation of the changes to the Oyster Creek TS.

The Oyster Creek TS are in a custom format that does not coincide with the industry Standard Technical Specifications (STS). The STS include surveillance requirements with the Limiting Conditions for Operation while a separate section is provided in the Oyster Creek TS. Additionally, the Bases of the specifications are provided in a separate document in the STS but are included with the applicable specification in the Oyster Creek TS. No changes to the Oyster Creek Bases were required to support this proposed change.

#### 6.0 REGULATORY ANALYSIS

A description of this proposed change and its relationship to regulatory requirements and guidance was provided in the NRC Notice of Availability published on September 25, 2003 (68FR55416), TSTF-447, the documentation associated with the 10 CFR 50.44 rulemaking, and other related documents.

##### 6.1 Verification and Commitments

AmerGen Energy Company, LLC is not proposing any variations or deviations from the requirements of the STS changes described in TSTF-447, Revision 1 or the NRC staff's model safety evaluation dated September 25, 2003. However, changes reflect the custom format of the Oyster Creek TS.

In accordance with the NRC staff's Safety Evaluation (SE) the hydrogen and oxygen monitoring capability will be maintained but no longer considered safety related as defined in 10 CFR 50.2. The model SE was published in the Federal Register on September 25, 2003 (68FR55416) for this TS improvement. AmerGen Energy Company, LLC is making the following verifications and regulatory commitments:

1. AmerGen Energy Company, LLC has verified that a hydrogen monitoring system capable of diagnosing beyond design basis accidents is installed at Oyster Creek and is making a regulatory commitment to maintain that capability. The hydrogen monitors are included in the plant's Emergency Procedures, Operating Procedures, and Maintenance Procedures. This regulatory commitment is currently implemented.
2. Oyster Creek has an inerted containment. AmerGen Energy Company, LLC has verified that an oxygen monitoring system capable of verifying the status of the inerted containment is installed at Oyster Creek and is making a regulatory commitment to maintain that capability. The oxygen monitors are included in Operating Procedures and the plant's Maintenance Program. This regulatory commitment is currently implemented.

#### 7.0 NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

AmerGen Energy Company, LLC has reviewed the proposed No Significant Hazards Consideration Determination (NSHCD) published in the Federal Register as part of the CLIIP. AmerGen Energy Company, LLC has concluded that the proposed NSHCD presented in the Federal Register notice (68FR55416) is applicable to the Oyster Creek Generating Station and is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

#### 8.0 ENVIRONMENTAL EVALUATION

AmerGen Energy Company, LLC has reviewed the environmental evaluation included in the model safety evaluation dated September 25, 2003 (68FR55416) as part of the CLIIP. AmerGen Energy Company, LLC has concluded that the staff's findings presented in that evaluation are applicable to Oyster Creek and the evaluation is hereby incorporated by reference for this application.

#### 9.0 PRECEDENT

This application is being made in accordance with the CLIIP. AmerGen Energy Company, LLC is not proposing variations or deviations from the TS changes described in TSTF-447, Revision 1 or the NRC staff's model SE published on September 25, 2003 (68FR55416).

#### 10.0 REFERENCES

1. Technical Specification Task Force (TSTF) Standard Technical Specifications Change Traveler TSTF-447, Revision 1, "Elimination of Hydrogen Recombiners and Change to Hydrogen and Oxygen Monitors"
2. Federal Register, Volume 68, Number 186, Notice of Availability of Model Application Concerning Technical Specification Improvement to Eliminate Hydrogen Recombiner Requirement, and Relax the Hydrogen and Oxygen Monitor Requirements for Light Water Reactors Using the Consolidated Line Item Improvement Process, published September 25, 2003, (68FR55416).

**ENCLOSURE 2**

**Oyster Creek Technical Specification Change Request No. 321**

**Proposed Technical Specification Changes (Mark-up)**

**The pages included in this enclosure are:**

**PAGES**

**3.13-2**

**3.13-3**

**3.13-5**

**4.13-1**

**4.13-2**

C. In the event that any of these monitoring channels become inoperable, they shall be made OPERABLE prior to startup following the next COLD SHUTDOWN.

D. Wide Range Torus Water Level Monitor

1. Two wide range torus water level monitor channels shall be continuously indicated in the control room during POWER OPERATION.
2. With the number of OPERABLE accident monitoring channels less than the total Number of Channels shown in Table 3.13.1, restore the inoperable channel(s) to OPERABLE status within 7 days or place the reactor in the SHUTDOWN CONDITION within the next 24 hours.
3. With the number of OPERABLE accident monitoring instrumentation channels less than the Minimum Channels operable requirements of Table 3.13.1, restore the inoperable channel(s) to OPERABLE status within 48 hours or place the reactor in the SHUTDOWN CONDITION within the next 24 hours.

E. Wide Range Drywell Pressure Monitor

1. Two Wide Range Drywell Pressure monitor channels shall be continuously indicated in the control room during POWER OPERATION.
2. With the number of OPERABLE accident monitoring channels less than the total Number of Channels shown in Table 3.13.1, restore the inoperable channel(s) to OPERABLE status within 7 days or place the reactor in the SHUTDOWN CONDITION within the next 24 hours.
3. With the number of OPERABLE accident monitoring instrumentation channels less than the Minimum Channels operable requirements of 3.13.1, restore the inoperable channel(s) to OPERABLE status within 48 hours or place the reactor in the SHUTDOWN CONDITION within the next 24 hours.

F. ~~Drywell H<sub>2</sub> Monitor~~ **DELETED**

- ~~1. Two drywell hydrogen monitor channels shall be capable of continuously indicating in the control room during POWER OPERATION.~~



2. With the number of OPERABLE channels less than the total number of channels shown in Table 3.13.1, restore the inoperable channel to OPERABLE status within 30 days or place the reactor in the SHUTDOWN CONDITION within the next 24 hours.
3. With the number of OPERABLE channels less than the Minimum Channels Operable requirements of Table 3.13.1, restore at least one channel to OPERABLE status within 7 days or place the reactor in the SHUTDOWN CONDITION within the next 24 hours.

G. Containment High-Range Radiation Monitor

1. Two containment high-range radiation monitors shall be OPERABLE when PRIMARY CONTAINMENT INTEGRITY is required.
2. With the number of OPERABLE monitors less than 2:
  - a. Take appropriate action to restore the inoperable monitor(s) to OPERABLE status as soon as possible.
  - b. Perform any actions required by Table 3.1.1.
  - c. Restore the inoperable monitor(s) to OPERABLE status within 7 days of the failure or prepare and submit a Special Report within 14 days following the failure outlining the cause of inoperability, actions taken, and the planned schedule for restoring the monitors to OPERABLE status.
3. With the number of OPERABLE monitors less than 1, in addition to the actions of 3.13.G.2 above, restore at least 1 monitor to OPERABLE status within 7 days of the failure or have available a preplanned alternate method capable of being implemented to provide an estimate of the radioactive material in containment under accident conditions.

H. High-Range Radioactive Noble Gas Effluent Monitor

1. The high range radioactive noble gas effluent monitors listed in Table 3.13.1 shall be OPERABLE during POWER OPERATION.
2. With the number of OPERABLE channels less than required by the minimum channels OPERABLE requirements, restore the inoperable channel(s) to OPERABLE status within 7 days of the event or prepare and submit a Special Report within 30 days following the event outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the equipment to OPERABLE status.

BASES

The purpose of the safety/relief valve accident monitoring instrumentation is to alert the operator to a stuck open safety/relief valve which could result in an inventory threatening event.

TABLE 3.13.1

ACCIDENT MONITORING INSTRUMENTATION

<u>INSTRUMENT</u>	<u>TOTAL NO. OF CHANNELS</u>	<u>MINIMUM CHANNELS OPERABLE</u>
1. Relief Valve Position Indicator (Primary Detector*)	1/valve	
Relief Valve Position Indicator (Backup Indications**)	1/valve	
2. Wide Range Drywell Pressure Monitor (PT/PR-53 & 54)	2	1
3. Wide Range Torus Water Level (LT/LR-37 & 38)	2	1
4. <del>Drywell H<sub>2</sub> Monitor</del> <b>DELETED</b>	<del>2</del>	<del>1</del>
5. Containment High Range Radiation	2	1
6. High Range Radioactive Noble Gas Effluent Monitor		
a. Main Stack	1	1
b. Turbine Building Vents	1	1

\* Acoustic Monitor

\*\* Thermocouple

Thermocouple TE 65A can be substituted for thermocouple TE210-43V, W, or X  
 Thermocouple TE 65B can be substituted for thermocouple TE210-43Y or Z

#### 4.13 ACCIDENT MONITORING INSTRUMENTATION

Applicability: Applies to surveillance requirements for the accident monitoring instrumentation.

Objective: To verify the operability of the accident monitoring instrumentation.

Specification: A. Safety & Relief Valve Position Indicators

Each accident monitoring instrumentation channel shall be demonstrated operable by performance of the Channel Check and Channel Calibration operations at the frequencies shown in Table 4.13-1.

B. Wide Range Drywell Pressure Monitor

Each accident monitoring instrumentation channel shall be demonstrated operable by performance of the Channel Check and Channel Calibration operations at the frequencies shown in Table 4.13-1.

C. Wide Range Torus Water Level Monitor

Each accident monitoring instrumentation channel shall be demonstrated operable by performance of the Channel Check and Channel Calibration operations at the frequencies shown in Table 4.13-1.

D. ~~Drywell H2 Monitor~~ **DELETED**

~~Each accident monitoring instrumentation channel shall be demonstrated operable by performance of the Channel Check and Channel Calibration operations at the frequencies shown in Table 4.13-1.~~

E. Containment High-Range Radiation Monitor

Each accident monitoring instrumentation channel shall be demonstrated operable by performance of the Channel Check and Channel Calibration operations at the frequencies shown in Table 4.13-1.

F. High Range Radioactive Noble Gas Effluent Monitor

Each accident monitoring instrumentation channel shall be demonstrated operable by performance of the Channel Check and Channel Calibration operations at the frequencies shown in Table 4.13-1.

#### Bases:

The operability of the accident monitoring instrumentation ensures that sufficient information is available on selected plant parameters to monitor and assess these variables during and following an accident. This capability is consistent with NUREGs 0578 and 0737.

TABLE 4.13-1

ACCIDENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

<u>INSTRUMENT</u>	<u>CHECK</u>	<u>CALIBRATION</u>
1. Primary and Safety Valve Position Indicator (Primary Detector*)	A	B
Relief and Safety Valve Position Indicator (Backup Indications**)	A	B
Relief Valve Position Indicator (Common Header Temperature Element**)	C	B
2. Wide Range Drywell Pressure Monitor (PT/PR 53 & 54)	A	D
3. Wide Range Torus Water Level Monitor (LT/LR 37 & 38)	A	D
4. <del>Spargler Monitor</del> DELETED	<del>A</del>	<del>B</del>
5. Containment High Range Radiation Monitor	A	F***
6. High Range Radioactive Noble Gas Effluent Monitor		
a. Main Stack	A	G
b. Turbine Building Vent	A	G

Legend:

- A = at least once per 31 days
- B = at least once per 24 months
- C = at least once per 15 days until channel calibration is performed and thence at least once per 31 days
- D = at least once per 6 months
- E = ~~at least once per 12 months~~ DELETED
- ~~I = Span and Zero using calibration gases~~
- F = each refueling outage
- G = once per 20 months
- ~~J = Span and Zero using calibration gases~~

\* Acoustic Monitor

\*\* Thermocouple

\*\*\* Channel calibration shall consist of electronic signal substitution of the channel, not including the detector, for all decades above 10R/hr and a one point calibration check of the detector at or below 10R/hr by means of a calibrated portable radiation source traceable to NBS.

**ENCLOSURE 3**

**Oyster Creek Technical Specification Change Request No. 321**

**Retyped Technical Specification Pages**

**The pages included in this enclosure are:**

**PAGES**

**3.13-2**

**3.13-3**

**3.13-5**

**4.13-1**

**4.13-2**

- C. In the event that any of these monitoring channels become inoperable, they shall be made OPERABLE prior to startup following the next COLD SHUTDOWN.
  
- D. Wide Range Torus Water Level Monitor
  - 1. Two wide range torus water level monitor channels shall be continuously indicated in the control room during POWER OPERATION.
  - 2. With the number of OPERABLE accident monitoring channels less than the total Number of Channels shown in Table 3.13.1, restore the inoperable channel(s) to OPERABLE status within 7 days or place the reactor in the SHUTDOWN CONDITION within the next 24 hours.
  - 3. With the number of OPERABLE accident monitoring instrumentation channels less than the Minimum Channels operable requirements of Table 3.13.1, restore the inoperable channel(s) to OPERABLE status within 48 hours or place the reactor in the SHUTDOWN CONDITION within the next 24 hours.
  
- E. Wide Range Drywell Pressure Monitor
  - 1. Two Wide Range Drywell Pressure monitor channels shall be continuously indicated in the control room during POWER OPERATION.
  - 2. With the number of OPERABLE accident monitoring channels less than the total Number of Channels shown in Table 3.13.1, restore the inoperable channel(s) to OPERABLE status within 7 days or place the reactor in the SHUTDOWN CONDITION within the next 24 hours.
  - 3. With the number of OPERABLE accident monitoring instrumentation channels less than the Minimum Channels operable requirements of 3.13.1, restore the inoperable channel(s) to OPERABLE status within 48 hours or place the reactor in the SHUTDOWN CONDITION within the next 24 hours.
  
- F. DELETED

G. Containment High-Range Radiation Monitor

1. Two containment high-range radiation monitors shall be OPERABLE when PRIMARY CONTAINMENT INTEGRITY is required.
2. With the number of OPERABLE monitors less than 2:
  - a. Take appropriate action to restore the inoperable monitor(s) to OPERABLE status as soon as possible.
  - b. Perform any actions required by Table 3.1.1.
  - c. Restore the inoperable monitor(s) to OPERABLE status within 7 days of the failure or prepare and submit a Special Report within 14 days following the failure outlining the cause of inoperability, actions taken, and the planned schedule for restoring the monitors to OPERABLE status.
3. With the number of OPERABLE monitors less than 1, in addition to the actions of 3.13.G.2 above, restore at least 1 monitor to OPERABLE status within 7 days of the failure or have available a preplanned alternate method capable of being implemented to provide an estimate of the radioactive material in containment under accident conditions.

H. High-Range Radioactive Noble Gas Effluent Monitor

1. The high range radioactive noble gas effluent monitors listed in Table 3.13.1 shall be OPERABLE during POWER OPERATION.
2. With the number of OPERABLE channels less than required by the minimum channels OPERABLE requirements, restore the inoperable channel(s) to OPERABLE status within 7 days of the event or prepare and submit a Special Report within 30 days following the event outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the equipment to OPERABLE status.

BASIS

The purpose of the safety/relief valve accident monitoring instrumentation is to alert the operator to a stuck open safety/relief valve which could result in an inventory threatening event.

TABLE 3.13.1

ACCIDENT MONITORING INSTRUMENTATION

<u>INSTRUMENT</u>	<u>TOTAL NO. OF CHANNELS</u>	<u>MINIMUM CHANNELS OPERABLE</u>
1. Relief Valve Position Indicator (Primary Detector*)	1/valve	
Relief Valve Position Indicator (Backup Indications**)	1/valve	
2. Wide Range Drywell Pressure Monitor (PT/PR-53 & 54)	2	1
3. Wide Range Torus Water Level (LT/LR-37 & 38)	2	1
4. DELETED		
5. Containment High Range Radiation	2	1
6. High Range Radioactive Noble Gas Effluent Monitor		
a. Main Stack	1	1
b. Turbine Building Vents	1	1

\* Acoustic Monitor

\*\* Thermocouple

Thermocouple TE 65A can be substituted for thermocouple TE210-43V, W, or X

Thermocouple TE 65B can be substituted for thermocouple TE210-43Y or Z



#### 4.13 ACCIDENT MONITORING INSTRUMENTATION

Applicability: Applies to surveillance requirements for the accident monitoring instrumentation.

Objective: To verify the operability of the accident monitoring instrumentation.

- Specification:
- A. Safety & Relief Valve Position Indicators  
Each accident monitoring instrumentation channel shall be demonstrated operable by performance of the Channel Check and Channel Calibration operations at the frequencies shown in Table 4.13-1.
  - B. Wide Range Drywell Pressure Monitor  
Each accident monitoring instrumentation channel shall be demonstrated operable by performance of the Channel Check and Channel Calibration operations at the frequencies shown in Table 4.13-1.
  - C. Wide Range Torus Water Level Monitor  
Each accident monitoring instrumentation channel shall be demonstrated operable by performance of the Channel Check and Channel Calibration operations at the frequencies shown in Table 4.13-1.
  - D. DELETED
  - E. Containment High-Range Radiation Monitor  
Each accident monitoring instrumentation channel shall be demonstrated operable by performance of the Channel Check and Channel Calibration operations at the frequencies shown in Table 4.13-1.
  - F. High Range Radioactive Noble Gas Effluent Monitor  
Each accident monitoring instrumentation channel shall be demonstrated operable by performance of the Channel Check and Channel Calibration operations at the frequencies shown in Table 4.13-1.

Bases:

The operability of the accident monitoring instrumentation ensures that sufficient information is available on selected plant parameters to monitor and assess these variables during and following an accident. This capability is consistent with NUREGs 0578 and 0737.

TABLE 4.13-1

ACCIDENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

<u>INSTRUMENT</u>	<u>CHECK</u>	<u>CALIBRATION</u>
1. Primary and Safety Valve Position Indicator (Primary Detector*)	A	B
Relief and Safety Valve Position Indicator (Backup Indications**)	A	B
Relief Valve Position Indicator (Common Header Temperature Element**)	C	B
2. Wide Range Drywell Pressure Monitor (PT/PR 53 & 54)	A	D
3. Wide Range Torus Water Level Monitor (LT/LR 37 & 38)	A	D
4. DELETED		
5. Containment High Range Radiation Monitor	A	F***
6. High Range Radioactive Noble Gas Effluent Monitor		
a. Main Stack	A	G
b. Turbine Building Vent	A	G

Legend:

- A = at least once per 31 days
- B = at least once per 24 months
- C = at least once per 15 days until channel calibration is performed and thence at least once per 31 days
- D = at least once per 6 months
- E = DELETED
- F = each refueling outage
- G = once per 20 months

\* Acoustic Monitor

\*\* Thermocouple

\*\*\* Channel calibration shall consist of electronic signal substitution of the channel, not including the detector, for all decades above 10R/hr and a one point calibration check of the detector at or below 10R/hr by means of a calibrated portable radiation source traceable to NBS.

**ENCLOSURE 4**

**Oyster Creek Technical Specification Change Request No. 321**

**List of Regulatory Commitments**

### List of Regulatory Commitments

The following table identifies those actions committed to by AmerGen Energy Company, LLC in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments. Please direct questions regarding these commitments to Dave Robillard at (610) 765-5952.

Regulatory Commitments	Due Date / Event
AmerGen Energy Company, LLC will maintain the capability of monitoring containment Hydrogen for beyond design basis accidents.	Currently implemented in the emergency, operating, and maintenance procedures.
AmerGen Energy Company, LLC will maintain the capability of monitoring containment Oxygen to verify the status of the inerted containment.	Currently implemented in plant operation and maintenance procedures.