

NRC EMAIL TO AMERGEN

From: Timothy O'Hara
To: Wstewart@amergenenergy.com
Date: 6/7/04 9:33AM
Subject: Update On PI&R Finding(s)

Good Morning Bill,

I want to update you on some changes to information which was discussed at our exit meeting on May 21 2004;

(1) We informed you of a preliminary violation of 10 CFR 50, Appendix R, Section III. G. 2. (a). for the condition on the 480v switchgear room floor barriers. Upon further review, we have determined that this condition is a preliminary violation (NCV) for failure to comply with License Condition 2. C. (3) when the 480v switchgear room floor barriers were degraded and equivalently-rated floor closures were not provided.

(2) LER 02-003 reports a condition in which Oyster Creek does not comply with 10 CFR 50, Appendix R, Section III. G. 2 separation requirements. After reviewing the LER and the CAPs which addressed this situation we have decided that this will be treated as a cited violation of 10 CFR 50, Appendix R, Section III. G. 2. Our decision is, additionally, based upon the stated position of your engineering personnel that the non-compliance had been resolved via the 86-10 evaluation process. The approved Regulatory method to remedy this non-compliance is through the exemption request process. The non-compliance with 10 CFR 50, Appendix R, Section III. G. 2. is still present.

Len asked me to inform you of these changes. If you have any questions or comments on these items, please contact myself or Len Cline (315-342-4907).

Tim O'Hara
610-337-5043

CC: Cline, Leonard

From: Leonard Cline
To: dslear@amergenenergy.com
Date: 6/7/04 3:05PM
Subject: Fwd: Update On PI&R Finding(s)

Tim O'Hara sent Bill Stewart the attached email today. I also left Bill a message regarding this email. I am sending it to you just in case Bill is not around. The jist of the email is this:

1 - The original preliminary violation regarding 10 CFR 50, Appendix R, Section III. G. 2. (a). for the degraded condition of the 480v switchgear room floor barriers has been changed to a failure to comply with License Condition 2. C. (3). As far as the significance of this issue and whether it is minor or not, we are still reviewing the information that engineering provided us.

2 - With respect to the condition regarding the cable separation issue in the void under the 480 Vac switchgear rooms, fire protection experts in the region and headquarters have reviewed the additional information provided and agree with the team's initial determination that an Appendix R exemption is required for the failure to meet the cable separation requirements. As such, if you do not take appropriate action to obtain the required exemption, the team will pursue issuing a cited violation of 10 CFR 50, Appendix R, Section III. G. 2 under traditional enforcement.

L. Cline
SRI, James A. FitzPatrick
315-342-4298
lmc1@nrc.gov

CC: Raymond Lorson; Timothy O'Hara
CC: Cline, Leonard

From: Timothy O'Hara
To: McArlson@amergenenergy.com
Date: 6/8/04 3:27PM
Subject: Information Request & Questions on AR A2045756 E24

Hello Mark,

I've reviewed the evaluation (A2045756 E24) which you provided to Jeff Herrera on 5/26/04. After looking at the evaluation I'm requesting the following information.

Questions and information request relating to AR A2045756 E24, Attachment 1:

- (1) Please provide a copy of SER dated March 25, 1986 and SER dated June 25, 1990.
- (2) Please provide a copy of ECR 03-00851
- (3) Please provide a copy of the test and analysis which supports to statement made in the first sentence of paragraph 9.2
- (4) Please provide a copy of the ASTM E-119 fire rating test which supports the statement in the first sentence of paragraph 9.1.
- (5) Paragraph 4 of Section 4.4 discusses some of the physical characteristics of sand and cement. What sand compaction ratio is assumed in the statements made in this section? What sand compaction ratio was used in the installation of the sand in the void and in the floor penetrations? How will Amergen ensure these compaction ratios are maintained?
- (6) Paragraph 2 of Section 4.4 discusses "...Startup testing reports for GE BWR's with PGCC floor design have demonstrated that these sand barriers also provide an acceptable barrier for containing the halon used in underfloor design." Please provide a copy of these tests with

results and conclusions and an analysis of how they are applied at Oyster Creek. What sand compaction ratio was used in these tests?

(7) Section 4.3 says "NFPA 12A Section A.5.4.1 indicates that flammable liquid and gas fires are subject to prompt extinguishment when Halon 1301 is quickly introduced into the enclosure in sufficient quantity to provide an extinguishing concentration for the particular materials involved and Oyster Creek's halon systems have been designed and tested to satisfy these requirements." Please provide copies of these design calculations and tests which support this statement for the 480v switchgear rooms with the five holes in the floor? How much halon leakage existed in each switchgear room before the holes were drilled and after the holes were drilled?

Thanks for your help, I look forward to your response.

Tim O'Hara
610-337-5043

CC: Cline, Leonard; Dfawcett@amergenenergy.com; Herrera, Jeffrey

DOCUMENT REQUEST

Information Requested to Be Available for Bag-man Trip:
(electronic format is preferred in most cases - if appropriate)

1. Organization Chart & phone list
2. Technical Specifications & Updated Final Safety Analysis Report
3. List of all procedures used on-site (i.e., include applicable corporate procedures)
4. Copies of procedures related to the identification and resolution of problems; including root cause evaluations, operability determinations, work requests, MRule, ...
5. List of all deficiency documents for the last two years (since 4/1/02); i.e., CAPs, ARs, engineering requests, temporary modifications, calibrations failures, surveillance failures, operability evaluations, ...

Prefer a separate list for each CAP classification category (1-5) sorted by system and then date. Listings should include the following information, CAP#, date initiated, system, component id, problem description (full not abbreviated), and status.

In addition to the above would like a separate list of all CAPs initiated prior to 4/1/04 with evaluations, corrective actions, or follow-up verifications that remain open. This listing should also be sorted by system then date and should include the following information CAP#, date initiated, system, component id, problem description (full not abbreviated), and status.

6. Arrange meeting with Employee Concern Coordinator during bagman week
7. For all non-cited violations issued since the last PI&R inspection - copy of NCV and the associated deficiency documents, including the root cause analysis, corrective actions, and any other attachments.
8. Copy of all internal and external reviews of the corrective action program: QA audits & surveillances, OSRC audits, self-assessments, INPO reports, ... for the last two years
9. List of all Self-Assessments and QA Audits for the last two years
10. List of Maintenance Rule (a)(1) systems, including the history and current status. System health reports for all (a)(1) systems , and the top ten risk significant systems (based on RAW).
11. List of currently open temporary modifications, control room deficiencies, operator workarounds, ...
12. Copy of last 2 trend reports - internal CAP performance indicators that OC uses to monitor CAP health.
13. Copy of all adverse/negative trends CRs for the last two years
14. List of rework items and repeat failures
15. List of applicable operating experience reviews, NRC INs/GLs/Buls, Part 21s, ...
16. Risk-ranking of systems (i.e., RAW report)
17. Arrange meeting with QA Manager & Corrective Action Program Manager during bagman week
18. Maintenance work orders:

For following lists include work order no., description and status.

List of open corrective maintenance work orders for the top ten risk significant systems (based on RAW).

List of all online open corrective maintenance work orders initiated prior to 4/1/04 that remain open.

List of PM work orders beyond grace date.

19. Last MR a(3) assessment report.

20. Engineering requests

For following lists include engineering request no., description and status.

List of open engineering requests for the top ten risk significant systems (based on RAW).

List of all online open engineering requests initiated prior to 4/1/04 that remain open.