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An Exelon Company

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10 CFR 50.55a

2130-04-20201
August 23, 2004

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

Oyster Creek Generating Station
Facility License No. DPR-16
Docket No. 50-219

Subject: Response to Request for Additional Information Concerning
Alternative Repair of Control Rod Drive Housing Interface with Reactor Vessel

- References:**
- 1) AmerGen letter 2130-00-20300 dated November 10, 2000, "Alternative Repair of Control Rod Drive Housing Interface with Reactor Vessel"
 - 2) AmerGen letter 2130-00-20304 dated November 14, 2000, "Modification to Proposed Alternative Repair of Control Rod Drive Housing Interface with Reactor Vessel"
 - 3) USNRC letter dated November 16, 2000, "Request to Use an Alternative Repair of the Control Rod Drive Housing Interface with the Reactor Vessel at the Oyster Creek Nuclear Generating Station (TAC NO. MB0461)"
 - 4) AmerGen letter 2130-01-20031 dated January 19, 2001, "Alternative Repair of Control Rod Drive Housing Interface with Reactor Vessel Clarification of Leakage Inspection"
 - 5) USNRC letter dated January 8, 2002, "Oyster Creek Nuclear Generating Station - Clarification of Leakage Inspection (TAC NO. MB1065)"
 - 6) AmerGen letter 2130-02-20214 dated July 26, 2002, "Alternative Repair of Control Rod Drive Housing Interface with Reactor Vessel"
 - 7) AmerGen letter 2130-02-20291 dated October 4, 2002, "Additional Information - Alternative Repair of Control Rod Drive Housing Interface with Reactor Vessel (TAC No. MB5700)"
 - 8) USNRC letter dated October 18, 2002, "Oyster Creek Nuclear Generating Station - Alternative Repair of Control Rod Drive Housing Interface with Reactor Vessel (TAC NO. MB5700)"
 - 9) AmerGen letter 2130-03-20271 dated October 21, 2003, "Alternative Repair of Control Rod Drive Housing Interface with Reactor Vessel"
 - 10) AmerGen letter 2130-04-20157 dated July 20, 2004, "Response to Request for Additional Information Concerning Alternative Repair of Control Rod Drive Housing Interface with Reactor Vessel"

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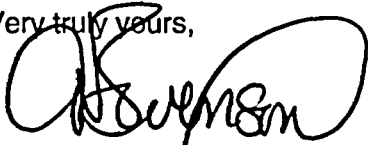
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In the Reference 9 letter, in accordance with 10 CFR 50.55a(a)(3)(i), AmerGen Energy Company, LLC (AmerGen) requested continued approval of the proposed alternative to 10 CFR 50.55a(g) as contained in the Reference 6 letter above.

This issue was discussed with the NRC staff in conference calls dated May 26, 2004, August 6, 2004, August 17, 2004, and August 19, 2004, and resulted in additional information being provided in the Reference 10 letter. In response to these discussions, we are continuing to request approval of the proposed alternative to 10 CFR 50.55a(g) as provided in the Reference 9 letter, with the addition of the revised allowable leakage rates and conditions as provided in the attached Tables 1 and 2.

If you should have any questions, please contact Mr. Tom Loomis at 610-765-5510.

Very truly yours,



C. N. Swenson
Vice President Oyster Creek Generating Station
AmerGen Energy Company, LLC

Attachment: CRD Penetration – Allowable Leakage Rates

cc: S. J. Collins, USNRC, Administrator, Region I
P. S. Tam, USNRC, Senior Project Manager, Oyster Creek
R. J. Summers, USNRC, Senior Resident Inspector, Oyster Creek
File No. 00086

TABLE 1
CRD Penetration - Allowable Leakage Rates for
Inspections During Plant Outages
with a Scheduled Duration of
Less than or Equal to 7 Days

Condition	Allowable Leak Rates ³		Required Actions ¹
	800-1100 psig	Depressurized	
Previously Unrolled	80 drops/min.	20 drops/min.	<ul style="list-style-type: none"> • If leakage rate is zero, then acceptable for startup. • If leakage is greater than zero, but less than or equal to allowable leakage rate, then acceptable for startup. However, roll expand to 4% or perform ASME code weld repair at next refueling outage.² • If leakage is greater than allowable leakage rate, then roll expand to 4% or perform ASME code weld repair at this outage.
Rolled Once	70 drops/min	15 drops/min.	<ul style="list-style-type: none"> • If leakage rate is zero, then acceptable for startup. • If leakage is greater than zero, but less than or equal to allowable leakage rate, then acceptable for startup. However, roll expand to 6% or perform ASME code weld repair at next refueling outage.² • If leakage is greater than allowable leakage rate, then roll expand to 6% or perform ASME code weld repair at this outage.
Rerolled	60 drops/min.	10 drops/min.	<ul style="list-style-type: none"> • If leakage rate is zero, then acceptable for startup. • If leakage is greater than zero, but less than or equal to allowable leakage rate, then acceptable for startup. However, perform ASME code weld repair at next refueling outage.² • If leakage is greater than allowable leakage rate, then perform ASME code weld repair at this outage.

NOTE:

1. Any roll repairs intended to be left in service after, or performed at, refueling outage R21 requires submittal of a relief request to the NRC 6 months prior to entering refueling outage R21 for approval.
2. At the conclusion of the unit's refueling outage R21, all CRD penetrations, unrolled, rolled, rerolled, or weld repaired will meet a zero leakage requirement prior to returning the unit to power operation.
3. Allowable leakage rates greater than zero leakage will no longer be acceptable as of the beginning of refueling outage R21.

TABLE 2
CRD Penetration - Allowable Leakage Rates for
Inspections During Plant Outages
with a Scheduled Duration of
Greater than 7 Days

Condition	Allowable Leak Rates ³		Required Actions ¹
	800-1100 psig	Depressurized	
Previously Unrolled	No leakage	No leakage	<ul style="list-style-type: none"> • If leakage rate is zero, then acceptable for startup. • If greater than zero leakage, then roll expand to 4% or perform ASME code weld repair at this outage.
Rolled Once	70 drops/min.	15 drops/min.	<ul style="list-style-type: none"> • If leakage rate is zero, then acceptable for startup. • If leakage is greater than zero, but less than or equal to allowable leakage rate, then acceptable for startup. However, roll expand to 6% or perform ASME code weld repair at next refueling outage.² • If leakage is greater than allowable leakage rate, then roll expand to 6% or perform ASME code weld repair at this outage.
Rerolled	60 drops/min.	10 drops/min.	<ul style="list-style-type: none"> • If leakage rate is zero, then acceptable for startup. • If leakage is greater than zero, but less than or equal to allowable leakage rate, then acceptable for startup. However, perform ASME code weld repair at next refueling outage.² • If leakage is greater than allowable leakage rate, then perform ASME code weld repair at this outage.

NOTE:

- 1) Any roll repairs intended to be left in service after, or performed at, refueling outage R21 requires submittal of a relief request to the NRC 6 months prior to entering refueling outage R21 for approval.
- 2) At the conclusion of the unit's refueling outage R21, all CRD penetrations, unrolled, rolled, rerolled, or weld repaired will meet a zero leakage requirement prior to returning the unit to power operation.
- 3) Allowable leakage rates greater than zero leakage will no longer be acceptable as of the beginning of refueling outage R21.