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10 CFR 50.90

October 19, 2004
2130-04-20248

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

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

Subject: Technical Specification Change Request No. 331 - Safety Limit Minimum Critical Power Ratio Response to Request for Additional Information

References: 1) Letter from C. N. Swenson (AmerGen Energy Company, LLC) to USNRC, dated August 27, 2004

2) Letter from C. N. Swenson (AmerGen Energy Company, LLC) to USNRC, dated October 11, 2004

In the Reference 1 letter, AmerGen Energy Company, LLC (AmerGen), requested an amendment to the Technical Specifications (TS), Appendix A of Operating License No. DPR-16 for Oyster Creek Generating Station (OCGS). This proposed change will revise Technical Specification (TS) Section 2.1.A to incorporate revised Safety Limit Minimum Critical Power Ratios (SLMCPRs) due to the cycle specific analysis performed by Global Nuclear Fuel for OCGS, Cycle 20.

On October 1, 2004 and October 19, 2004, conference calls were held with NRC Staff regarding our request. Reference 2 provided our response to questions discussed during the October 1, 2004 call. Attached is our response to the questions discussed on the October 19, 2004 call. This information is being submitted under unsworn declaration.

One (1) commitment is contained within this letter, as discussed in Attachment 2.

If you have any questions or require additional information, please contact Tom Loomis at (610) 765-5510.

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

Respectfully,

10/20/2004
Executed on

C. N. Swenson
Vice President, Oyster Creek Generating Station

Attachments: 1- Response to Request for Additional Information
2-Commitment

cc: S. J. Collins, Administrator, USNRC Region I
P. S. Tam, USNRC Senior Project Manager, Oyster Creek
R. J. Summers, USNRC Senior Resident Inspector, Oyster Creek
File No. 02079

cc: Mr. Kent Tosch, Director
Bureau of Nuclear Engineering
Department of Environmental Protection
CN 415
Trenton, NJ 08628

The Honorable John Parker
Mayor of Lacey Township
818 West Lacey Road
Forked River, NJ 08731

ATTACHMENT 1

OYSTER CREEK GENERATING STATION

DOCKET NO. 50-219

LICENSE NO. DPR-16

Response to Request for Additional Information

Question:

Explain how Oyster Creek Generating Station (OCGS) will insure that the calculated SLMCPR will remain bounding for all operating conditions.

Answer:

Oyster Creek Generating Station (OCGS) will operate within the analyzed operating domain, including both off-rated and rated power/ flow conditions (i.e., bounded by the rod lines analyzed for SLMCPR), to ensure that the calculated SLMCPR remains bounding throughout Cycle 20. For both off-rated and rated power/flow conditions there is reasonable confidence that the nominal rod patterns utilized by OCGS will produce MCPR distributions less severe than those assumed in the SLMCPR calculations. The more severe MCPR distributions assumed in the SLMCPR calculations produce a more conservative SLMCPR value than would be produced if the SLMCPR were calculated with the nominal rod patterns.

Question:

Explain the basis for the R-factor as provided in the August 27, 2004 Technical Specification Change Request.

Response:

At this time, there is no evidence that Oyster Creek Generating Station is experiencing control blade corrosion-induced channel bow. The extra conservative R-factor uncertainty as provided in the Technical Specification Change Request generically accounts for increased channel bow as observed in some BWR/4 C-lattice, BWR/5 and BWR/6 reactors. Since no evidence of control blade corrosion-induced bow has been seen for the Oyster Creek Generating Station, use of the higher uncertainty is conservative relative to the methodology and uncertainties that have been previously reviewed and approved generically by the NRC. In the event that Oyster Creek Generating Station conclusively experiences channel bow, justification for the higher R-factor uncertainty will be provided to the NRC for review.

ATTACHMENT 2

OYSTER CREEK GENERATING STATION

DOCKET NO. 50-219

LICENSE NO. DPR-16

Commitment

SUMMARY OF COMMITMENTS

The following table identifies commitments made in this document. (Any other actions discussed in the submittal represent intended or planned actions. They are described to the NRC for the NRC's information and are not regulatory commitments.)

COMMITMENT	COMMITTED DATE OR "OUTAGE"
In the event that Oyster Creek Generating Station conclusively experiences channel bow, justification for the higher R-factor uncertainty will be provided to the NRC for review.	By Refueling Outage 21 (Fall 2006)