

November 9, 2005

C. N. Swenson  
Site Vice President  
AmerGen Energy Company, LLC  
P.O. Box 388  
Forked River, NJ 08731

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION FOR THE REVIEW OF THE  
OYSTER CREEK NUCLEAR GENERATING STATION, LICENSE RENEWAL  
APPLICATION (TAC NO. MC7624)

Dear Mr. Swenson:

By letter dated July 22, 2005, AmerGen Energy Company, LLC submitted to the U.S. Nuclear Regulatory Commission (NRC or the staff) an application pursuant to Title 10 of the *Code of Federal Regulations* Part 54 (10 CFR Part 54) to renew the operating license for Oyster Creek Nuclear Generating Station. The NRC staff is reviewing the information contained in the license renewal application and has identified, in the enclosure, an area where additional information is needed to complete the review.

This question was discussed with a member of your staff, Mr. John Huffnagel, and a mutually agreeable date for this response is within 30 days from the date of this letter. If you have any questions, please contact me at 301-415-3191 or via e-mail at [DJA1@nrc.gov](mailto:DJA1@nrc.gov).

Sincerely,

**/RA/**

Donnie J. Ashley, Project Manager  
License Renewal Branch A  
Division of License Renewal  
Office of Nuclear Reactor Regulation

Docket No.: 50-219

Enclosure: As stated

cc w/encl: See next page

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**Adams accession no.: ML053140042**

Document Name: E:\Filenet\ML053140042.wpd

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DISTRIBUTION: Ltr to C.N. Swenson, Re: RAI for Oyster Creek, Dated: November 9, 2005  
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**OYSTER CREEK NUCLEAR GENERATING STATION  
LICENSE RENEWAL APPLICATION (LRA)  
REQUEST FOR ADDITIONAL INFORMATION (RAI)**

**RAI 2.1.5.2-1**

Grouted Penetrations

Section 4.5.1 of Oyster Creek Position Paper PP-03, "Criteria for Scoping Systems and Structures Relied Upon to Demonstrate Compliance With 10 CFR 54.4(a)(2)," Revision 3, provides instructions for establishing system boundaries for non-safety-related (NSR) piping systems connected directly to safety-related (SR) piping systems. One of the acceptable methods in PP-03 for establishing license renewal (LR) piping system boundaries is to extend the piping system boundary up to a wall or slab past the SR/NSR interface and credit the grouted wall or slab piping penetration as an anchor that is equivalent to a seismic anchor. The applicant stated that thirteen grouted wall or slab piping penetrations were credited as equivalent anchors. Two of the thirteen grouted wall or slab piping penetrations were included in Stress Calculation C-1302-251-5320-004 Revision 4. The remaining 11 grouted wall or slab piping penetrations were not included in Stress Calculation C-1302-251-5320-004 Revision 4, nor were they supported by any other technical analysis that demonstrated that grouted wall or slab piping penetrations are equivalent to a seismic anchor. Based on the staff's review of the applicant's scoping evaluation related to the 10 CFR 54.4a(2) criterion, the staff requires additional information to complete its review. Specifically, the staff requests the applicant provide the technical basis for establishing that the 11 grouted wall or slab piping penetrations are equivalent to seismic anchors.

**RAI 2.1.5.2-2**

Underground Piping

Section 2.1.5.2 of the Oyster Creek License Renewal Application (LRA) describes the applicant's screening and scoping methodology for NSR systems and structures affecting SR systems or structures. This section of the LRA states that piping that exits a structure and is routed underground is credited as an anchor that is equivalent to a seismic anchor. This same method is described in Section 4.5.1.3 of PP-03. During the audit, the applicant clarified that although this method is described in the LRA and PP-03, it was not used at Oyster Creek. Based on the staff's review of the applicant's scoping evaluation related to the 10 CFR 54.4a(2) criterion, the staff requires additional information to complete its review. Specifically, the staff requests the applicant verify that underground piping was not credited as an anchor that is equivalent to a seismic anchor.

## **RAI 2.5.1.15-1**

### **Support Systems**

Section 4 of the Oyster Creek Position Paper PP-07, "Systems and Structures Relied upon to Demonstrate Compliance with 10 CFR 54.48 - Fire Protection," Revision 3, states that first-level, primary support systems that are necessary for the functioning of equipment credited in the Fire Hazard Analysis Report or Safe Shutdown Analysis to demonstrate compliance with 10 CFR 54.48 (Fire Protection) are included in scope of LR. Table 1 of PP-07 lists the standby gas engine generator as in scope of LR. However, Section 2.5.1.15, "Radio Communication System," of the Oyster Creek LRA does not list the standby gas engine generator as in scope. The applicant stated during the audit that Section 2.5.1.15 of the LRA is correct and that the standby gas engine generator was removed from the scope of LR because it is not the radio communication system's primary power source.

Section 2.1.3.1.3, "Regulated Events," of NUREG-1800, "Standard Review Plan," states that an applicant need not consider hypothetical failures or second, third or fourth-level support systems in determining the systems, structures, and components (SSCs) within the scope of the rule under 10 CFR 54.4(a)(3). Section 2.1.3.1.3 also states that all SSCs that are relied upon in the plant's current licensing basis (CLB), plant-specific experience, industry-wide experience (as appropriate), and safety analyses or plant evaluations to perform a function that demonstrates compliance with NRC regulations identified under 10 CFR 54.4(a)(3), are required to be included within the scope of LR.

Based on the staff's review of the applicant's scoping evaluation related to the 10 CFR 54.4a(3) criterion, the staff requires additional information to complete its review. Specifically, the staff requests the applicant:

- A. Verify that the Oyster Creek CLB, plant-specific experience, industry-wide experience (as appropriate), and safety analyses or plant evaluations do not require the standby gas engine generator to perform a function that demonstrates compliance with NRC regulations identified under 10 CFR 54.4(a)(3).
- B. Verify that second, third or fourth-level support systems were included in scope of LR if the Oyster Creek CLB, plant-specific experience, industry-wide experience (as appropriate), and safety analyses or plant evaluations require the second, third or fourth-level support system to perform a function that demonstrates compliance with NRC regulations identified under 10 CFR 54.4(a)(3).