

**From:** D. Ashley  
**To:** George Beck; John Hufnagel  
**Date:** 03/17/2006 6:50:59 AM  
**Subject:** Fwd: Additional follow-up questions for Audit Q&A database

John, George-

Attached are the subject questions from the Audit Team Leader.

He requests that you add to the Q&A Database and include in your next update for ADAMS addition.

=====  
regards,

Donnie Ashley  
NRR/DLR/RLRA  
Oyster Creek  
License Renewal Project Manger  
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dja1@nrc.gov

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**Subject:** Fwd: Additional follow-up questions for Audit Q&A database  
**Creation Date:** 03/17/2006 6:50:59 AM  
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<b>Recipients</b>	<b>Action</b>	<b>Date &amp; Time</b>
exeloncorp.com 6:51:10 AM George.Beck (George Beck) john.hufnagel (John Hufnagel)	Transferred	17 March, 2006

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**From:** Roy Mathew  
**To:** D. Ashley  
**Date:** 03/16/2006 4:12:06 PM  
**Subject:** Additional follow-up questions

Donnie: see attached file. Please forward this to the applicant. Thanks, Roy

**CC:** James Davis

**Audit team follow-up questions: James Davis, NRC**

1. The Lubricating Oil Analysis Program - FRCT (OCGS AMP B.1.39) takes exception to the GALL Report requirement to monitor flash point. .

The basis provided for exceptions to GALL, Element 3 (Parameters Monitored or Inspected) is not valid since the Flash Point of an industrial lubricant is an important test to determine if light-end hydrocarbons are getting into the oil through seal leaks or other means. It is an effective way to monitor seal performance in light end hydro-carbon compressors. Low Flash Points pose a safety hazard in the event of component failure that can generate heat above the flash point of the oil, such as bearing failure.

Please justify the reason for not monitoring the flash point of lubricating oil at the FRCT and why this exception is acceptable to manage the effects of aging for which it is credited.

2. PBD-AMP-B.2.2, "Lubricating Oil Monitoring Activities," Element 3 states that oil analysis guidelines will be enhanced to include measurement of flash point for diesel engine lubricating oil. This is a new enhancement based on the reconciliation of this aging management program from the draft January 2005 NUREG-1800, Rev. 1 to the approved September 2005 NUREG-1801, Rev. 1. This enhancement is not identified in OCGS LRA B.2.2. Is the LRA supplemented to reflect this?
3. PBD -AMP- B.1.12, "Bolting Integrity" identifies an enhancement to NUREG-1801 for elements 1, 2, and 7. This enhancement is not identified in OCGS LRA B1.12. Is the LRA supplemented to reflect this?
4. PBD -AMP- B.1.21, "Aboveground Outdoor Tanks," identifies an exception to NUREG-1801 for element 5 (The program utilizes tank inspections every 5 years in place of system walkdowns each outage). This exception is not identified in OCGS LRA B1.12. Is the LRA supplemented to reflect this? What is the basis for this exception? why this exception is acceptable to manage the effects of aging for which it is credited.