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10 CFR 50
10 CFR 51
10 CFR 54

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

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

Subject: Supplemental Information Addressing the Forked River Combustion Turbine Quality Assurance Attributes, Related to the Oyster Creek Generating Station License Renewal Application (TAC No. MC7624)

- References:**
1. NRC September 28, 2005 "Request for Additional Information (RAI) for the Review of the Oyster Creek Generating Station, License Renewal Application (TAC NO. MC7624)," related to the Forked River Combustion Turbines
 2. AmerGen October 12, 2005 Response to NRC Request for Additional Information (RAI 2.5.1.19-1), dated September 28, 2005, related to Oyster Creek Generating Station License Renewal Application (TAC NO. MC7624)
 3. AmerGen November 11, 2005 Supplemental Response to NRC Request for Additional Information (RAI 2.5.1.19-1), dated September 28, 2005, related to Oyster Creek Generating Station License Renewal Application (TAC No. MC7624)
 4. AmerGen May 9, 2006 Response to NRC Request for Additional Information (RAI 3.6.2.3.3), dated April 20, 2006 related to Oyster Creek Generating Station License Renewal Application (TAC No. MC7624)

In Reference 1, the NRC requested additional information regarding the Forked River Combustion Turbines (FRCT) to facilitate review activities associated with the Oyster Creek Generating Station License Renewal Application (LRA). The FRCTs are credited with providing power to Oyster Creek in the event of a Station Blackout Event. In References 2 and 3, AmerGen Energy Company, LLC (AmerGen) provided information describing the results of FRCT Aging Management Reviews and the Aging Management Programs being established for the FRCT equipment in support of license renewal.

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Subsequent discussions with NRC Staff determined that additional information is needed for the Staff to review the approach that AmerGen is taking with regard to the program elements of corrective action, confirmation and administrative controls for FRCT aging management activities. In support of this request, AmerGen has updated LRA Sections A.0.5, "Quality Assurance Program and Administrative Controls," and B.0.3, "Quality Assurance Program and Administrative Controls," to include information describing these aspects of the FRCT aging management activities. These updated LRA sections are provided in Enclosure 1. The original text of these LRA sections is repeated, with new text added and shown in bold print.

In references 2, 3 and 4, AmerGen made specific commitments to implement the FRCT programs referred to in Enclosure 1. In addition, as summarized in Enclosure 2, AmerGen makes the following commitment:

Prior to the period of extended operation, AmerGen will ensure that procedures are established to implement the program elements of Corrective Action, Confirmation, and Administrative Controls, as described in Sections A.0.5 and B.0.3 of Enclosure 1, for the Forked River Combustion Turbine aging management activities.

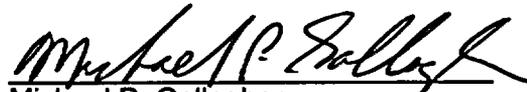
This commitment will be added to the updated LRA Appendix A.5 license renewal commitment list, to be submitted in a separate letter on a schedule to support NRC Staff completion of the Safety Evaluation Report.

If you have any questions, please contact Fred Polaski, Manager License Renewal, at 610-765-5935.

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

Respectfully,

Executed on 05-18-2006


Michael P. Gallagher
Vice President, License Renewal
AmerGen Energy Company, LLC

Enclosures: 1. Updated LRA Sections A.0.5 and B.0.3 describing the FRCT Quality Assurance Program and Administrative Controls
2. Summary of Commitments

cc: Regional Administrator, USNRC Region I, w/o Enclosure
USNRC Project Manager, NRR - License Renewal, Safety, w/Enclosure
USNRC Project Manager, NRR - License Renewal, Environmental, w/o Enclosure
USNRC Project Manager, NRR - OCGS, w/o Enclosure
USNRC Senior Resident Inspector, OCGS, w/o Enclosure
Bureau of Nuclear Engineering, NJDEP, w/Enclosure
File No. 05040

Enclosure 1

**Updated LRA Sections A.0.5 and B.0.3 describing the FRCT
Corrective Action, Confirmation and Administrative Controls Program
Elements**

A.0.5 QUALITY ASSURANCE PROGRAM AND ADMINISTRATIVE CONTROLS

Oyster Creek Generating Station

The existing Oyster Creek Quality Assurance Program implements the requirements of 10 CFR 50, Appendix B, and is consistent with the summary in Appendix A.2, "Quality Assurance For Aging Management Programs (Branch Technical Position IQMB-1)" of NUREG-1800. The Quality Assurance Program includes the elements of corrective action, confirmation process, and administrative controls, and these elements are applicable to the safety-related and non-safety related systems, structures, and components (SSCs) that are subject to Aging Management Review (AMR). In many cases, existing activities were found adequate for managing aging effects during the period of extended operation.

Forked River Combustion Turbine Power Plant

The Oyster Creek CLB credits the Forked River Combustion Turbine power plant, located adjacent to the Oyster Creek site, as the Alternate AC power source utilized to cope with a postulated Station Blackout (SBO) event. The Forked River Combustion Turbine power plant is not owned by AmerGen. Therefore, the Oyster Creek Quality Assurance Program is not implemented for Forked River station activities that are not performed by AmerGen personnel.

For the in-scope portions of the Forked River Combustion Turbine power plant, several aging management programs will be implemented. The Oyster Creek Structures Monitoring Program (B.1.31) scope will be expanded to include the required structural inspections. The Inaccessible Medium Voltage Cables Not Subject to 10 CFR 50.49 Environmental Qualification Requirements (B.1.36) program scope will include the required cable testing for the Forked River Combustion Turbine power plant. The Periodic Monitoring of Combustion Turbine Power Plant – Electrical (B.1.37) program will include the required electrical commodity visual inspections for the Forked River Combustion Turbine power plant. The Electrical Cable Connections Not Subject to 10 CFR 50.49 Environmental Qualification Requirements (B.1.40) program scope will include electrical cable connections at the Forked River Combustion Turbine power plant.

The structural aging management program (B.1.31) and the three electrical aging management programs (B.1.36, B.1.37, and B.1.40) applicable to the Forked River Combustion Turbine power plant will be implemented by AmerGen personnel under the existing SBO Agreement between AmerGen and FirstEnergy, utilizing the Oyster Creek 10 CFR 50 Appendix B Quality Assurance Program.

The mechanical aging management programs applicable to the Forked River Combustion Turbine power plant are closely tied to Forked River plant operation and maintenance activities, and therefore the associated aging management activities may be implemented by AmerGen or by the organizations responsible for operation and maintenance of the combustion turbines. In either case, AmerGen will continue oversight activities in accordance with the SBO Agreement. AmerGen will ensure that processes and procedures that address the aging management program elements of corrective action, confirmation process, and administrative controls, applicable to the non-safety related Forked River Combustion Turbine power plant mechanical systems, structures, and components that are subject to Aging Management Review (AMR), are established prior to the period of extended operation.

B.0.3 Quality Assurance Program and Administrative Controls

Oyster Creek Generating Station

The existing Oyster Creek Quality Assurance Program implements the requirements of 10 CFR 50, Appendix B, and is consistent with the summary in Appendix A.2, "Quality Assurance For Aging Management Programs (Branch Technical Position IQMB-1)" of NUREG-1800. The Quality Assurance Program includes the elements of corrective action, confirmation process, and administrative controls, and is applicable to the safety-related and non-safety related systems, structures, and components (SSCs) that are subject to AMR. In many cases, existing activities were found adequate for managing aging effects during the period of extended operation. Generically the three elements are applicable as follows:

Corrective Actions:

A single corrective action process is applied at the Oyster Creek Station, regardless of the safety classification of the system, structure, or component. Corrective actions are implemented through the initiation of an Issue Report (IR) in accordance with the Corrective Action Program established in response to 10 CFR 50, Appendix B. The Corrective Action Program requires the initiation of an Issue Report for actual or potential problems, including unexpected plant equipment degradation, damage, failure, malfunction or loss. Site documents that implement aging management programs for license renewal will direct that an Issue Report be prepared in accordance with those procedures whenever non-conforming conditions are found (i.e., the acceptance criteria are not met). It is noted that previous Corrective Action Programs referred to Condition Reports (CRs) or CAPs for documenting actual or potential problems and non-conforming conditions. These terms are synonymous with the term Issue Report.

Equipment deficiencies are corrected through the Work Control Program in accordance with plant procedures. Although equipment deficiencies may initially be documented by the Work Control Program, the Corrective Action Program specifies that an Issue Report also be initiated, if required, for condition identification, assignment of significance level and investigation class, investigation, corrective action determination, investigation report review and approval, action tracking, and trend analysis.

The Oyster Creek Corrective Action Program implements the requirements of the Exelon Quality Assurance Topical Report (QATR), Chapter 16, "Corrective Action." Specifically, Conditions Adverse to Quality and Significant Conditions Adverse to Quality are resolved through direct action, the implementation of Corrective Actions, and where appropriate, the implementation of Corrective Actions to Prevent Recurrence.

Confirmation Process:

The focus of the confirmation process is on the follow-up actions that must be taken to verify effective implementation of corrective actions. The measure of effectiveness is in terms of correcting and precluding repetition of adverse conditions. The Oyster Creek Corrective Action Program includes provisions for timely evaluation of adverse conditions and implementation of any corrective actions required, including root cause determinations and prevention of recurrence where appropriate (e.g., Significant Conditions Adverse to Quality). The Corrective Action Program provides for tracking, coordinating, monitoring, reviewing, verifying, validating, and approving corrective actions, to ensure effective corrective actions are taken. The Corrective Action Program also monitors for potentially adverse trends.

The existence of an adverse trend due to recurring or repetitive adverse conditions will result in the initiation of an Issue Report. The AMPs required for license renewal would also uncover any unsatisfactory condition due to ineffective corrective action.

Since the same 10 CFR 50, Appendix B corrective actions and confirmation process is applied for nonconforming safety related and non-safety related systems, structures, and components subject to Aging Management Review (AMR) for license renewal, the Corrective Action Program is consistent with the NUREG-1801 elements.

Administrative Controls:

The document control process at **Oyster Creek** applies to all generated documents, procedures, and instructions regardless of the safety classification of the associated system, structure, or component. Document control processes are implemented in accordance with the requirements of 10 CFR 50, Appendix B, "Quality Assurance Requirements for Nuclear Power Plants and Fuel Reprocessing Plants." Implementation is further defined in the Exelon Quality Assurance Topical Report (QATR), Chapter 6, "Document Control."

Administrative controls procedures provide information on procedures, instructions and other forms of administrative control documents, as well as guidance on classifying these documents into the proper document type and as-building frequency. Revisions will be made to procedures and instructions that implement or administer aging management program requirements for the purposes of managing the associated aging effects for the period of extended operation.

Forked River Combustion Turbine Power Plant

The Oyster Creek CLB credits the Forked River Combustion Turbine power plant, located adjacent to the Oyster Creek site, as the Alternate AC power source utilized to cope with a postulated Station Blackout (SBO) event. The Forked River Combustion Turbine power plant is not owned by AmerGen. Therefore, the Oyster Creek Quality Assurance Program is not implemented for Forked River station activities that are not performed by AmerGen personnel.

For the in-scope portions of the Forked River Combustion Turbine power plant, several aging management programs will be implemented. The Oyster Creek Structures Monitoring Program (B.1.31) scope will be expanded to include the required structural inspections. The Inaccessible Medium Voltage Cables Not Subject to 10 CFR 50.49 Environmental Qualification Requirements (B.1.36) program scope will include the required cable testing for the Forked River Combustion Turbine power plant. The Periodic Monitoring of Combustion Turbine Power Plant – Electrical (B.1.37) program will include the required electrical commodity visual inspections for the Forked River Combustion Turbine power plant. The Electrical Cable Connections Not Subject to 10 CFR 50.49 Environmental Qualification Requirements (B.1.40) program scope will include electrical cable connections at the Forked River Combustion Turbine power plant.

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The mechanical aging management programs applicable to the Forked River Combustion Turbine power plant are closely tied to Forked River plant operation and maintenance activities, and therefore the associated aging management activities may be implemented by AmerGen or by the organizations responsible for operation and maintenance of the combustion turbines. In either case, AmerGen will continue oversight activities in accordance with the SBO Agreement. AmerGen will ensure that processes and procedures that address the aging management program elements of corrective action, confirmation process, and administrative controls, applicable to the non-safety related Forked River Combustion Turbine power plant mechanical systems, structures, and components that are subject to Aging Management Review (AMR), are established prior to the period of extended operation. These aging management programs are described in the AmerGen letter dated November 11, 2005, which provided the final response to the NRC Request for Additional Information (RAI) 2.5.1.19-1.

NRC Regulatory Guide 1.155, "Station Blackout" provides guidance for demonstrating compliance with the 10 CFR 50.63 Station Blackout rule. Appendix A of this regulatory guide provides quality assurance guidance for non-safety related systems and equipment used to meet the requirements of 10 CFR 50.63. This guidance provides the basis for the quality assurance program that will be applied to the Forked River Combustion Turbine power plant. In addition, the Forked River Combustion Turbine power plant aging management program elements of corrective action, confirmation process, and administrative controls, are consistent with the summary in NUREG-1800 Appendix A.2, "Quality Assurance For Aging Management Programs (Branch Technical Position IQMB-1)" and NUREG-1800 Appendix A.1 (Branch Technical Position RLSB-1), as described below.

Corrective Actions:

Measures will be established to ensure that failures, malfunctions, deficiencies, deviations, defective components and nonconformances are promptly identified, reported and corrected. When established acceptance criteria are not met, the condition will be documented and evaluated for potential corrective action. Required corrective actions will include root cause determination and implementation of actions required to prevent recurrence, as necessary.

Confirmation Process:

A confirmation process will be established to ensure that corrective actions have been completed and are effective. When corrective actions are necessary, follow-up activities will be implemented to confirm that the corrective actions were completed, and when appropriate, a root cause determination was performed and recurrence prevented.

The effectiveness of prevention and mitigation programs will be verified. For example, the effectiveness of the Fuel Oil Chemistry – FRCT (B.1.22A) will be verified by inspections performed by the One-Time Inspection – FRCT (B.1.24A) program.

Administrative Controls:

Inspections and tests will be administratively controlled by documented instructions, procedures and drawings. These documents will require formal review and management approval prior to use. Inspection and test activities will be performed in accordance with these controlled documents.

Results of the test and inspection activities will be documented. The documented test and inspection results will be maintained as auditable and retrievable records.

A summary description of the new aging management programs that will be implemented for the Forked River Combustion Turbine power plant have been included in the LRA Appendix A UFSAR Supplement, as described in the AmerGen letters dated October 12, 2005 and November 11, 2005, which provided the AmerGen response to the NRC Request for Additional Information (RAI) 2.5.1.19-1.

The procedures that will be used to implement the Forked River Combustion Turbine power plant aging management program elements of corrective action, confirmation process, and administrative controls, will be established prior to entering the period of extended operation.

Enclosure 2

Summary of Commitments

Enclosure 2

Summary of Commitments

The following table identifies the commitment made in this document. Any other actions discussed in this 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	One-Time Action (Yes/No)	Programmatic (Yes/No)
Prior to the period of extended operation, AmerGen will ensure that procedures are established to implement the program elements of Corrective Action, Confirmation and Administrative Controls, as described in Sections A.0.5 and B.0.3 of Enclosure 1, for the Forked River Combustion Turbine aging management activities.	Prior to period of extended operation	No	Yes