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10 CFR 50 10 CFR 51 10 CFR 54

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2130-06-20346

June 7, 2006

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 Related to Oyster Creek Generating Station License Renewal Application (TAC No. MC7624)
- Reference: December 9, 2005 Response to NRC Request for Additional Information, dated November 9, 2005, Related to Oyster Creek Generating Station License Renewal Application (TAC No. MC7624)

In the referenced letter, AmerGen Energy Company, LLC (AmerGen) provided a response to NRC Request for Additional Information (RAI) 2.5.1.15-1, associated with Oyster Creek License Renewal. As part of this response, AmerGen committed to implement aging management activities for the Radio Communications system equipment and associated supporting structures located at the Meteorological Tower.

The RAI response described two aging management programs that will be credited. As noted in the response, the existing Oyster Creek Structures Monitoring Program (B.1.31) scope will be expanded to include the required structural and external surface inspections associated with the Radio Communications system equipment at the Meteorological Tower. This work will be implemented by AmerGen personnel under the existing Easement, License and Restrictive Covenant Agreement between AmerGen and FirstEnergy, utilizing the Oyster Creek 10 CFR 50 Appendix B Quality Assurance Program.

Also as described in the RAI response, a new program (Buried Piping and Tank Inspection – Met Tower Repeater Engine Fuel Supply (B.1.26B)) will be implemented to address the inscope buried piping and tanks. An LRA Appendix B description of the new program was provided. The program was reviewed against the NUREG-1801, Section X1.M.34 Buried Piping and Tanks Inspection AMP. At the time of the RAI response, AmerGen elected to take an exception to program elements 7, 8 and 9 - Corrective Actions, Confirmation Process, and Administrative Controls. These program elements did not credit the Oyster Creek 10 CFR 50 Appendix B quality assurance (QA) program, but instead AmerGen proposed alternate means to meet the guidance in Branch Technical Position IQMB-1, Quality Assurance for Aging Management Programs.

AILY

AmerGen has now elected to eliminate this NUREG-1801 exception, and to credit the Oyster Creek 10 CFR 50 Appendix B quality assurance (QA) program. The revised LRA Appendix B description for the new Buried Piping and Tank Inspection – Met Tower Repeater Engine Fuel Supply (B.1.26B) AMP is included in the Enclosure, with new text shown in bold font. Other previously submitted FSAR Supplement information (i.e., A.1.26B, A.1.31, A.5 and B.1.31) is unaffected by this change.

For clarity and completeness, with respect to quality assurance requirements for electrical aging management activities at the Meteorological Tower, AmerGen provides the following information. Subsequent to the RAI 2.5.1.15-1 response, AmerGen committed to a new Electrical Cable Connections Not Subject to 10 CFR 50.49 Environmental Qualification Requirements (B.1.40) AMP (AmerGen Letter 2130-06-20327, dated May 9, 2006). This new AMP is in response to RAI 3.6.2.3.3 and is applicable to in-scope electrical connections metallic parts. The scope of this new AMP includes applicable in-scope electrical connections associated with the Radio Communications system equipment at the Meteorological Tower. This new AMP will be implemented by AmerGen personnel under the existing Easement, License and Restrictive Covenant Agreement between AmerGen and FirstEnergy, utilizing the Oyster Creek 10 CFR 50 Appendix B Quality Assurance Program.

No new Regulatory Commitments are made in this letter.

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

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

Enclosure: Response to Request for Additional Information

06-07-2006

 cc: Regional Administrator, USNRC Region I, w/o Enclosure USNRC Project Manager, NRR - License Renewal, Safety USNRC Project Manager, NRR - License Renewal, Environmental, w/o Enclosure USNRC Project Manager, NRR - Oyster Creek USNRC Senior Resident Inspector, Oyster Creek, w/o Enclosure Bureau of Nuclear Engineering, New Jersey Department of Environmental Protection File No. 05040

ENCLOSURE

UPDATED PROGRAM DESCRIPTION - B.1.26B

BURIED PIPING AND TANK INSPECTION -

MET TOWER REPEATER ENGINE FUEL SUPPLY

B.1.26B BURIED PIPING AND TANK INSPECTION - MET TOWER REPEATER ENGINE FUEL SUPPLY

Program Description

The Buried Piping and Tank Inspection - Met Tower Repeater Engine Fuel Supply aging management program is a new aging management program that relies on coating, wrapping and periodic inspection as a preventive measure, and to mitigate and manage the effects of corrosion on the pressure-retaining capacity of carbon steel and copper piping and fittings, and carbon steel tank, in a soil (external) environment. External coatings and wrappings are maintained in accordance with standard industry practices. External inspections of buried piping components will occur opportunistically when excavated during maintenance. Within 10 years prior to entering the period of extended operation, inspection of buried piping components will be performed unless an opportunistic inspection occurs within this ten-year period. Upon entering the period of extended operation, inspection of buried piping components will again be performed within the next ten years, unless an opportunistic inspection occurs during this ten-year period. The aging management program activities described below as well as in Section A.1.26B will be coordinated with First Energy, as necessary, pursuant to an Easement, License, and Restrictive Covenant Agreement.

NUREG-1801 Consistency

The Buried Piping and Tank Inspection - Met Tower Repeater Engine Fuel Supply aging management program is consistent with the ten elements of aging management program XI.M.34, "Buried Piping and Tanks Inspection," specified in NUREG-1801, with exceptions.

Exceptions to NUREG-1801

 NUREG-1801, Section X1.M.34 Buried Piping and Tanks Inspection AMP relies on preventive measures such as coatings and wrappings, however portions of this piping may not be coated or wrapped. Inspections of buried piping that is not wrapped will inspect for loss of material due to general, pitting, crevice, and microbiologically influenced corrosion.

Enhancements

The Buried Piping and Tank Inspection – Met Tower Repeater Engine Fuel Supply aging management program is a new program to be implemented for the buried piping and tank located at the meteorological tower.

Evaluation and Technical Basis

1. Scope of Program

This program relies on coating, wrapping and periodic inspection as a preventive measure, and to mitigate and manage loss of material caused by corrosion of the external surface of the buried piping and tank. These activities will be used to manage external aging effects of the underground steel and copper piping, fittings, and tank. The buried components are exposed to a soil environment that may be sufficiently aggressive to result in loss of material caused by general, pitting, and crevice corrosion, and microbiologically-influenced corrosion (MIC). Periodic inspections are performed when the components are excavated for maintenance or for any other reason. The scope of the program covers buried carbon steel and copper portions of the meteorological tower repeater engine fuel supply (propane) piping and tank at the meteorological tower that is within the scope of license renewal.

2. Preventive Actions

In accordance with industry practice, portions of the underground piping and tank at the meteorological tower were either procured with coating or coated during installation with a protective coating system to protect the piping and tank from contacting the potentially aggressive soil environment. Portions of the piping may not be coated or wrapped.

3. Parameters Monitored/Inspected

This program monitors parameters such as coating and wrapping integrity directly related to corrosion damage of the external surface of buried steel piping and tanks. The program also directly monitors, for indications of corrosion, the external surfaces of buried steel and copper piping that are not coated or wrapped. Coatings and wrappings, and the external surface of buried piping components that are not coated or wrapped, are inspected by visual techniques. Coatings and wrappings will be inspected for any evidence of damaged wrapping or coating defects, such as coating perforation, holidays, or other damage, that is an indicator of possible corrosion damage to the external surface of the piping or tank. The external surfaces of buried piping components that are not coated or wrapped will be inspected directly for any evidence of corrosion.

4. Detection of Aging Effects

Inspections will be performed to confirm that coating and wrapping are intact, and to determine the extent of potential corrosion of buried piping components that are not coated or wrapped. These inspections are an effective method to ensure that corrosion of external surfaces has not occurred and the intended function is maintained. The buried piping and tank will be opportunistically inspected whenever excavated for maintenance. The inspections will be performed on all of the areas made accessible to support the maintenance activity.

It is anticipated that one or more opportunistic inspections may occur within a tenyear period. Within 10 years prior to entering the period of extended operation, inspection of the buried piping and tank will be performed unless an opportunistic inspection occurs within this ten-year period. Upon entering the period of extended operation, inspection of the buried piping and tank will again be performed within the next ten years, unless an opportunistic inspection occurs during this ten-year period. Inspections will be performed in areas with the highest likelihood of corrosion problems, and in areas with a history of corrosion problems, if any. The meteorological tower repeater engine fuel supply has not had a history of corrosion problems on the exterior surfaces of buried piping or the tank to date.

5. Monitoring and Trending

Results of any previous inspections will be used to identify susceptible locations for future inspections.

6. Acceptance Criteria

Any coating and wrapping degradations, and any associated or other piping or tank degradation, will be reported and evaluated in accordance with corrective actions procedures. External component degradation is reported and evaluated whenever buried commodities are uncovered during yard excavation activities. Leakage detected through periodic testing and visual inspections will be evaluated in accordance with the corrective actions procedures. Evaluations will consider system and component ability to perform their intended functions. The extent of surface corrosion and meteorological tower repeater engine fuel supply operating experience will determine corrective actions and the need and scope for extent of condition and future inspections.

7. Corrective Actions

If an inspection identifies a degraded condition, a Corrective Action Program Issue Report will be initiated in accordance with 10 CFR Part 50, Appendix B plant administrative procedures. The degraded condition will be evaluated and corrective actions are taken as necessary. The 10 CFR Part 50 Appendix B corrective action program ensures that conditions adverse to quality are properly corrected. If the deficiency is found to be significantly adverse to quality, the cause of the condition is determined and an action plan is developed to preclude recurrence.

8. Confirmation Process

Site quality assurance procedures, review and approval processes and administrative controls are implemented in accordance with the requirements of 10 CFR Part 50, Appendix B.

9. Administrative Controls

Site quality assurance procedures, review and approval processes and administrative controls are implemented in accordance with the requirements of 10 CFR Part 50, Appendix B.

10. Operating Experience

The Buried Piping and Tank Inspection – Met Tower Repeater Engine Fuel Supply aging management program is a new program that will be effective in managing aging degradation for the period of extended operation by providing timely detection of aging effects and implementation of appropriate corrective actions prior to loss of system or component intended functions. The buried piping and tank at the meteorological tower that is included in the scope of license renewal is the below grade propane filled piping and tank next to the meteorological tower.

Conclusion

The Buried Piping and Tank Inspection - Met Tower Repeater Engine Fuel Supply aging management program will provide reasonable assurance that the aging effects on the external surfaces of buried piping components are adequately managed so that the intended functions of components within the scope of license renewal are maintained consistent with the current licensing basis during the period of extended operation.