

2130-06-20348  
June 13, 2006

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:** Response to NRC Request to Revise Calculation C-1302-215-E320-063 for the Reactor Water Clean-up High Energy Line Break Detection and Isolation and Instrumentation Setpoint

- References:**
- 1) AmerGen letter 2130-05-20029 dated February 2, 2005, Technical Specification Change Request No. 280 – Reactor Water Clean-up High Energy Line Break Detection and Isolation.
  - 2) USNRC email dated October 18, 2005, Request for Additional Information (RAI) on Oyster Creek Generating Station Technical Specification Change Request - Reactor Water Clean-up High Energy Line Break Detection and Isolation (TAC No. MC6046).
  - 3) AmerGen letter 2130-06-20283 dated April 19, 2006, Response to Request for Additional Information Concerning Technical Specification Change Request on Reactor Water Clean-up High Energy Line Break Detection and Isolation

This letter provides additional information as requested by the NRC staff during a telephone conference on May 31, 2006. The request for information is in regard to AmerGen Energy Company's Technical Specification Change Request (TSCR) No. 280 (Reference 1) to include the setpoint for the Reactor Water Clean-up High Energy Line Break detection and isolation instrumentation in the Technical Specifications.

In Reference 2, the NRC staff requested additional information related to the methodology used at Oyster Creek in establishing the setpoint for the Reactor Water Clean-up High Energy Line Break instrumentation. AmerGen provided the response to

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the request for additional information in Reference 3. After reviewing AmerGen's response, the NRC requested a telephone conference to discuss C-1302-215-E320-063, RWCU HELB High Temperature Setpoint Error Calculation, that established the values for the as found, as left and nominal trip set points for the RWCU HELB instrumentation temperature switches. The telephone conference was conducted on May 31, 2006 between AmerGen (D. Robillard, et al) and the NRC (G. E. Miller, et al) to discuss the calculation. During the conference, the NRC expressed concern regarding the calculation methodology, specifically, the establishment of the as found upper limit in section 7.6 of the calculation. The NRC concern was focused on the fact that the calculation included the as left tolerance twice in the determination of the upper as found limit. Inclusion of the as left tolerance twice provides for a band of 12 degrees F, between the nominal trip set point and the upper as found limit. The NRC is concerned that the band of 12 degrees would mask potentially degrading instrument performance, and requested that AmerGen revise the calculation to only include the as left tolerance once in the calculation of the upper as found limit. AmerGen concurs with this request and will revise the calculation accordingly. AmerGen anticipates that this change will reduce the as-found band to approximately 8 degrees F. The calculation will be revised, prior to implementation of the approved license amendment. Enclosure 1 provides a summary of the regulatory commitments made in this submittal. No changes to the original license amendment request are required due to submittal of these responses to the NRC RAI.

If any additional information is needed, please contact Mr. Dave Robillard at (610) 765-5952.

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

Respectfully,

gbrk  
6/13/06  
Executed On

  
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Pamela B. Cowan  
Director – Licensing & Regulatory Affairs  
AmerGen Energy Company, LLC

Enclosures

cc: S. J. Collins, Administrator, USNRC Region 1  
G. E. Miller, USNRC Project Manager, Oyster Creek  
M. S. Ferdas, USNRC Senior Resident Inspector, Oyster Creek  
File No. 04036

**ENCLOSURE 1**

**LIST OF REGULATORY COMMITMENTS**

The following table identifies those actions committed to by AmerGen Energy Company, LLC (AmerGen) in this document. Any other statements in the submittal are provided for information purposes and are not considered to be regulatory commitments.

COMMITMENT	COMMITTED DATE	COMMITMENT TYPE	
		ONE-TIME ACTION (Yes/No)	PROGRAMMATIC (Yes/No)
AmerGen will revise calculation C-1302-215-E320-063, RWCU HELB High Temperature Setpoint Error Calculation, to only include the as left tolerance once in the calculation of the upper as found limit.	Prior to implementation of the approved license amendment to incorporate the RWCU HELB instrumentation in the Technical Specifications	NO	YES