

**From:** "Richard Webster" <rwebster@kinoy.rutgers.edu>  
**To:** "Glenn Meyer" <GWM@nrc.gov>, <RJC@nrc.gov>  
**Date:** 05/24/2007 11:06:53 AM  
**Subject:** Re: YOUR CONCERNS ON DRWYWELL SHELL THICKNESS

Thanks for your e-mail. As discussed last night, since November 2006 we have been asking for the NRC's numerical estimates of the area in each drywell bay that is below 0.736 inches and for the NRC's estimate of the uncertainty of those estimates. The attached letter from March 30, 2006 gives the full details of my request. If you have not performed such estimates, please let me know how NRC has confirmed compliance with the local area acceptance criterion for areas that are larger than 2 inches in diameter. I trust NRC will respond to my letter in the very near future.

One of documents I referred to last night is also attached. I will send the other by separate e-mail. They appear to indicate that AmerGen believes that there is an area of 9 square feet in Bay 1 with a representative thickness of 0.696 inches. If this is correct, we believe that would raise an operability problem because the local area acceptance criterion requires that contiguous areas thinner than 0.736 inches to be, at most, 9 square feet or less (in fact AmerGen has always applied a more stringent local area acceptance criterion and we believe that the 9 square foot formulation of the local acceptance criterion is not justified by the underlying modeling).

At this time I am neither making an allegation nor filing a 2.206 petition. I am providing these documents for your information and am asking NRC to review whether they raise a concern. As I emphasized last night, the Office of Inspection General reminded staff in 2002 that requiring absolute proof of a safety problem is an unreasonably high burden. Instead, the review should determine whether there is reasonable assurance that the areas of the drywell that are thinner than 0.736 inches are smaller than the area allowed by the appropriate local area acceptance criterion. I believe that this standard means that where there is considerable uncertainty about a key parameter, the uncertainty should be resolved in favor of safety by requiring a high degree of certainty that the parameter actually meets the requirements. I would appreciate a written response summarizing the outcomes of your review.

Thank you for your consideration.

Richard Webster

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inadvertently, please reply to the sender and delete all versions on your system.

Thank you.

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Thank you.

>>> "Richard Conte" <RJC@nrc.gov> 5/24/2007 9:32 AM >>>

Mr. Webster, last night at the Oyster Creek Annual Assessment meeting, you expressed concerns about new information you found in the hearing discovery process related to license renewal. You felt the new information is applicable to current operability issue you discussed in a March 2007 letter to us.

You indicated last night that you would send me the new information. For convenience could you send your March letter also. As Mr. Collins indicated we will get back to you shortly if we see any immediate safety concerns.

If will be appreciated if you can reply to all and send the information to Mr. Meyer also.

**CC:** <Jill.Lipoti@dep.state.nj.us>, "Debbie Mans" <Debbie.Mans@gov.state.nj.us>, <may@nrc.gov>

**Mail Envelope Properties** (4655A9DE.9D2 : 0 : 27090)

**Subject:** Re: YOUR CONCERNS ON DRWYWELL SHELL THICKNESS  
**Creation Date** 05/24/2007 11:05:15 AM  
**From:** "Richard Webster" <rwebster@kinoy.rutgers.edu>  
**Created By:** rwebster@kinoy.rutgers.edu

**Recipients**

nrc.gov

kp1\_po.KP\_DO

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<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	3755	05/24/2007 11:05:15 AM
3-30-07 Letter to NRC re thin areas.pdf		128722
2-7-07 Estimates of thin areas.pdf		1300518
Mime.822	1961335	

**Options**

**Expiration Date:** None  
**Priority:** Standard  
**ReplyRequested:** No  
**Return Notification:** None

**Concealed Subject:** No  
**Security:** Standard

**Junk Mail Handling Evaluation Results**

Message is eligible for Junk Mail handling  
This message was not classified as Junk Mail

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Junk Mail handling disabled by User  
Junk List is not enabled  
Junk Mail using personal address books is not enabled  
Block List is not enabled

# RUTGERS ENVIRONMENTAL LAW CLINIC

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March 30, 2007

## VIA E-MAIL AND US-MAIL

Ms. Catherine Haney  
Director, Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation  
United States Nuclear Regulatory Commission  
Washington, DC 20555-0001

Dear Ms. Haney:

On behalf of STROC, the citizen's coalition including Nuclear Information and Resource Service (NIRS), Jersey Shore Nuclear Watch, Inc., Grandmothers, Mothers and More for Energy Safety, New Jersey Sierra Club, New Jersey Environmental Federation (NJEF) and New Jersey Public Interest Research Group (NJPIRG), I thank you for your letter of March 16, 2007. I am following up because, although your letter correctly states my questions, it fails to provide a complete answer.

First, I note that you state "the Oyster Creek drywell shell had adequate margin against buckling in accordance with ASME code assuming a one square foot area thinner than 0.736 inches but thicker than 0.536 inches." Our calculations actually show that the area thinner than 0.736 inches in Bay 13 could be over four square feet, although the actual area is highly uncertain because the number of measured points is small. To check this calculation, we would like the NRC's *numerical* assessment of the area in each bay that is thinner than 0.736 inches, an explanation of how those areas were derived, and a *numerical* estimate of the uncertainty with which those areas are known. Because it took over four months for you to respond to my previous query, I anticipate that you should have full knowledge of this issue and will be able to respond much more rapidly.

Second, we are surprised that NRC staff believes the last round of measurements showed "no evidence of significant reduction in drywell thickness." In fact, AmerGen's own statistical assessment states that the thinning observed was on average 0.02 inches, although the assessment attributed this thinning to an improvement in measurement technique, not ongoing corrosion. Whatever the cause, this amount of thinning cannot be dismissed as insignificant. Brookhaven National Laboratories ("BNL") in their review of the current licensing basis (attached to Letter from NRC to GPU, dated April 24, 1992) stated "there may not be adequate margin left for further corrosion . . . unless it is demonstrated that that removal of the sand will completely stop

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## RUTGERS ENVIRONMENTAL LAW CLINIC

further thickness reductions." Thus, *any* further thickness reduction beyond those observed in 1992 are cause for concern according to BNL. Furthermore, AmerGen's analysis, while more optimistic, also suggests that the observed thinning is significant. AmerGen's own estimates of the average thickness margins in the sandbed region contained in calculation C-1302-187-5320-024 were as low as 0.056 inches in Bay 11 before the latest results were taken. If AmerGen's estimate is correct, an average reduction in thickness of 0.02 inches would mean that this margin has now reduced by around 36%. Thus, based on the analyses of BNL and AmerGen, we do not understand how the observed thinning could be termed "insignificant." Please provide an explanation of NRC staff's reasoning on this point.

We trust you will understand that this matter is of the utmost importance for those who live close to the plant and in the region. We therefore respectfully request an urgent written response to this letter. Please feel free to answer these two questions separately, if it would enable a more rapid response to be provided. Thank you for your consideration and we look forward to hearing from you shortly.

Yours sincerely,



Richard Webster

c.c. Donald Silverman, Esq., Counsel for AmerGen  
Mitzi Young, Esq., Counsel for NRC  
Jill Lipoti, NJ DEP  
Valerie Gray, Esq., Counsel for NJDEP

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**From:** Tamburro, Peter  
**Sent:** Wednesday, February 07, 2007 09:53 AM  
**To:** 'Soo Bee Kok'  
**CC:** Ray, Howie; O'Rourke, John F.; Ouaou, Ahmed  
**Subject:** Oyster Creek Drywell Analysis: Corrosion Data information and Code of Record  
**Attachments:** Contours.xls

Soo Bee

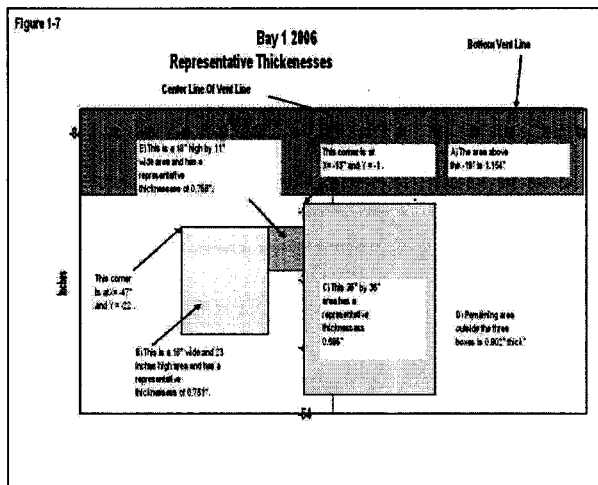
Attached is an Excel spreadsheet that provides thickness information for the Drywell Vessel.

The thicknesses for the sandbed are based on a draft calculation C-1302-187-5320-024 Revision 2.

The thickness above the sandbed are based on the most recent ACRS presentation minus 20 mils for instrumentation uncertainties

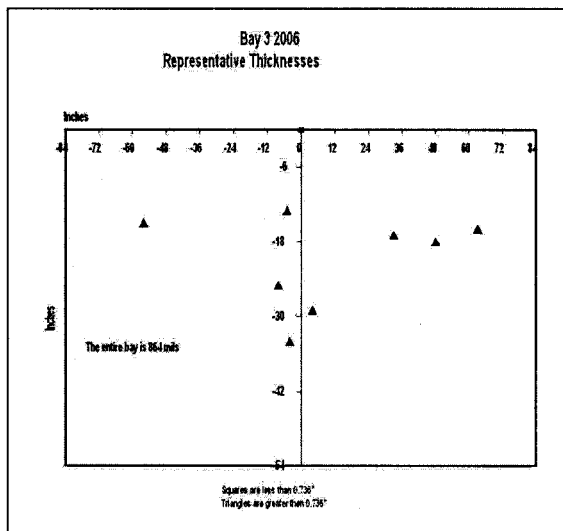
Also, Howie Ray asked me to document the Code of Record for the Drywell Vessel

According to The Oyster Creek UFSAR Chapter 6.2.1.1.2. The Oyster Creek Primary Containment was designed, fabricated, inspected and tested in accordance with ASME Section VIII and Nuclear Code cases 1270N-5, 1271N and 1272N-5, and N-284

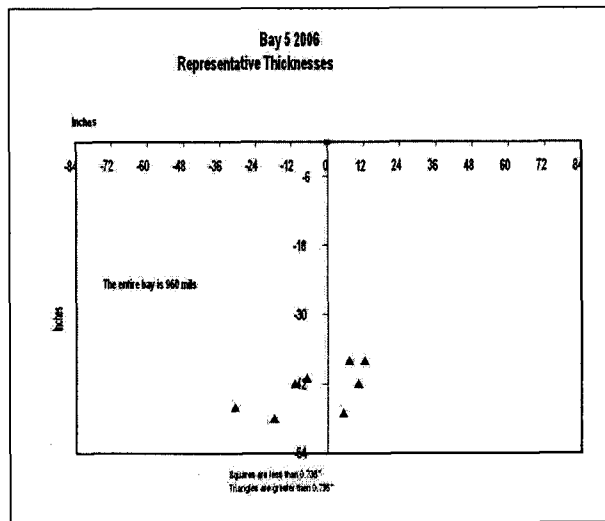


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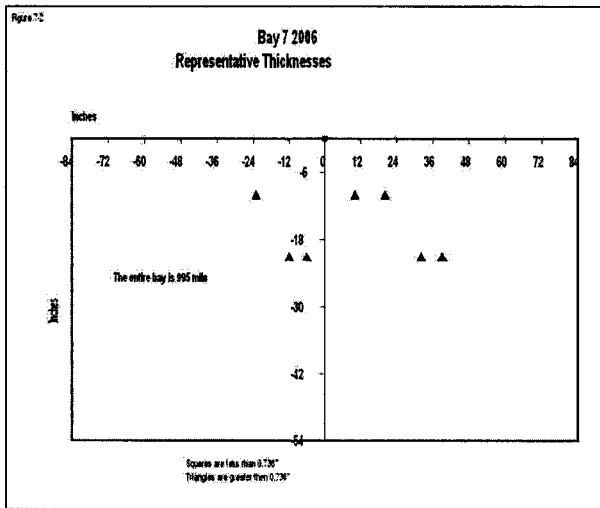




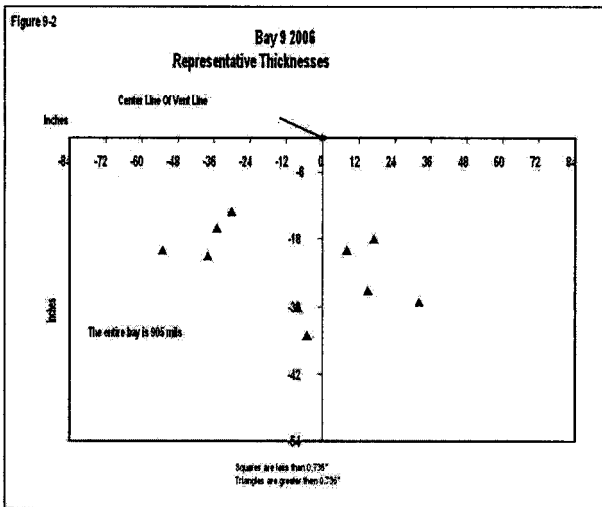
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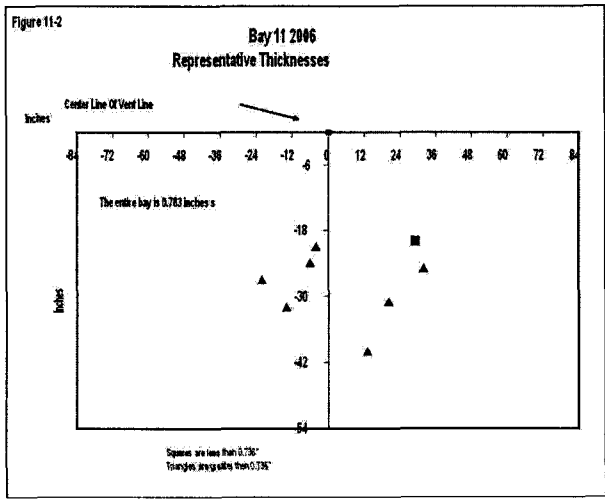
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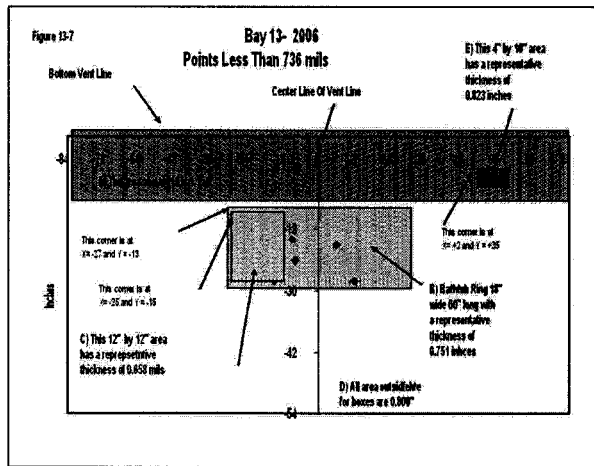
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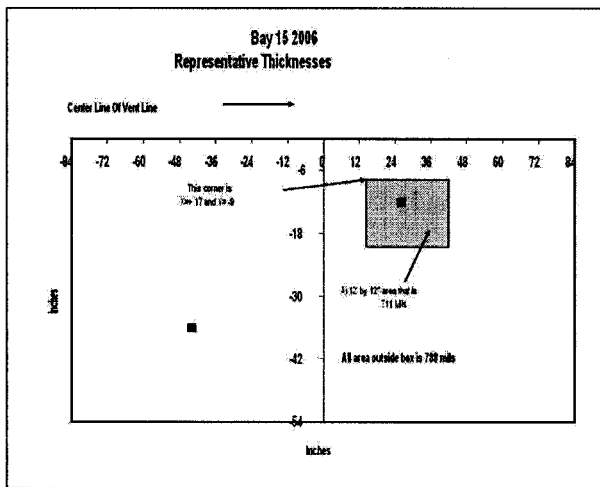
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OCLR00029713



OCLR00029714

OCLR00029715

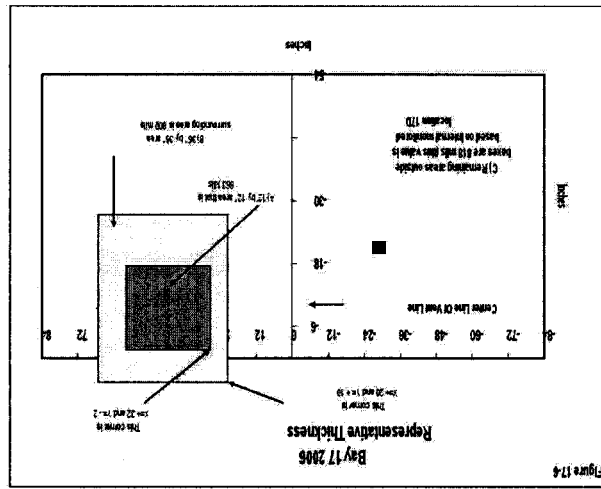
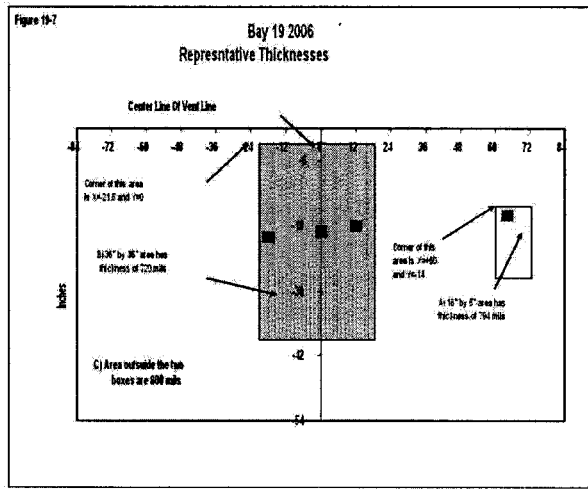


Figure 17-6





OCLR00029716