

RAS 14243

APPLICANT'S EXH. 32

THE HEADINGS AND NUMBERING USED BELOW ARE CONSISTENT WITH THE PM REQUEST CRITERIA FORM, ATTACH. 2 OF MA-MA-716-009

1. COMPONENT ID(S): Drywell and Torus (PM18704M)
2. UNIT / SYSTEM #: 1/187
3. Revise
4. COMPONENT NAME: Drywell and Torus
5. PROPOSED CHANGE TO PM DATABASE:
This eval is being submitted under AR A2133631 for the purpose of planning these activities for the 1R21 Outage.

Remove the existing planned work order activities 01,02,03 and 04, in PM18704M, since these activities are implemented in PM18703M.

A/R Number: A2014243, Evaluation NBR 80, IR #34845 was previously issued to create this PM. In addition, A2127016, Eval 01 was issued against the Library AR for this PM to provide further direction on the content of this PM. The purpose of this eval is to supplement the previous requests with those requirements required to be annotated and completed for License Renewal commitments, and to plan this PM under a 1R21 AR and corresponding work order(s).

In addition, this eval provides guidance to document the references for commitments made prior to license renewal for leakage monitoring to support the Drywell Corrosion Monitoring Program.

A. Incorporate the following into the PM:

1. ON THE FIRST PAGE OF THE NEW RECURRING TASK WORK ORDER, IN ONE OF THE FIELDS LABELED "PM CLASS / BASIS CODES", ENTER AN "L" (TO INDICATE THE W/O IS ASSOCIATED WITH A LICENSE RENEWAL COMMITMENT).
2. ON SCREEN 2 OF THE NEW WORK ORDER, IN THE COMMENTS SECTION, ENTER THE FOLLOWING:
THE OYSTER CREEK LICENSE RENEWAL APPLICATION INCLUDES A COMMITMENT TO DEVELOP AND IMPLEMENT AN ASME Section XI, Subsection IWE PROGRAM. THE COMMITMENT FOR THIS AGING MANAGEMENT PROGRAM (AMP) IS DOCUMENTED IN PASSPORT AR 00330592, ASSIGNMENT 27, Sub assignment 07. THE OYSTER CREEK IWE PROGRAM PROVIDES, AGING MANAGEMENT OF THE PRIMARY CONTAINMENT THE COMMITMENT MADE UNDER AMP B.1.27, ASME Section XI, Subsection IWE TAKES CREDIT FOR THE INSPECTION ADDRESSED BY THIS WORK ORDER TO ENSURE THAT CORROSION IS NOT AFFECTING THE FUNCTIONS OF THE PRIMARY CONTAINMENT. THESE LICENSE RENEWAL COMMITMENTS ARE ANNOTATED WITH THE (CM-1) ANNOTATION. IN ADDITION, LEAKAGE MONITORING IS ALSO A COMMITMENT FOR THE DRYWELL CORROSION MONITORING

U.S. NUCLEAR REGULATORY COMMISSION
In the Matter of AMERGEN ENERGY CO., LLC
Docket No. 50-019-LR Official Exhibit No. 32
OFFERED by Applicant/Discontinue Intervenor
NRC Staff Other
Identified on 9/19/07 Witness/Panel N/A
Action Taken: ADMITTED REJECTED WITHDRAWN
Respondent/Clerk

DOCKETED
USNRC
October 1, 2007 (10:45am)
OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Template - SECY-028

OCLR00019108

SECY-02

PROGRAM, WHICH PREDATED THE LICENSE RENEWAL COMMITMENTS. THESE COMMITMENTS ARE TRACKED BY REGULATORY ASSURANCE AS COMMITTED IN THE FOLLOWING REFERENCES AND ARE DESIGNATED BY (CM-2): FEBRUARY 15, 1996 LETTER NRC TO GPU NUCLEAR (TAC NO. M92688). IN THE INSPECTION ACTIVITIES UNDER THIS WORK ORDER, ENTRIES THAT ARE FOLLOWED WITH A "(CM-1)" or "(CM-2)" DESIGNATION ARE COMMITMENTS, AND MAY NOT BE DELETED OR REVISED UNLESS THE REQUIREMENTS OF LS-AA-110 ARE FULFILLED.

B. In the Purpose Section of the work order activities enter the following:

The purpose of this activity is to complete commitments made for License Renewal and as part of our Drywell Corrosion Monitoring Program. These commitments are documented in the comments section of the work order. The license renewal commitments are annotated with the (CM-1) annotation. In addition, leakage Monitoring is also a commitment for the Drywell Corrosion Monitoring Program, which predated the License Renewal Commitments. These commitments are designated by (CM-2):

C. Include the steps below to satisfy license renewal commitments.

1. Perform an inspection of the 5 sand bed region drains, in the torus room, for leakage every day during each outage while the reactor cavity contains water. (CM-1)(CM-2, no frequency committed)

a. Verify the poly bottles, which collect water leakage from the drains, are empty.

b. Visually inspect the tubing, which connect the drainpipes to the poly bottles for current flow of water or water drops.

c. Visually inspect the floor areas around and under the Torus for presence of water. If leakage is found, determine the source of leakage, and if not from the sandbed drains report the leakage in IR.

d. Notify engineering immediately if water is found in the poly bottles or if water leakage is observed coming from the sandbed drain lines.

e. If leakage is detected in any of the Sandbed Drains issue an IR with the following required actions per our commitments (CM-1):

1) Determine the source of leakage and investigate and address the impact of leakage on the drywell shell, including:

a) Verification of the condition of the drywell shell coating and moisture barrier (seal) in the sand bed region and

b) Performance of UT examinations of the shell in the upper regions.

2) UTs will also be performed on any areas in the sand bed region where visual inspection indicates the coating is damaged and corrosion has occurred.

3) UT results will be evaluated per the existing program.

4) Any degraded coating or moisture barrier will be repaired.

5) These actions will be completed prior to exiting the associated outage.

2. Perform an inspection of the reactor cavity concrete trough drain for leakage every day during each outage while the reactor cavity contains water. (CM-1)(CM-2, no frequency committed)

a. The affected drain is 2-inch diameter NN-6, valve V-18-131 shown on P&ID GE-237E756 Sheet 1 & JC-147434 Sheet 2. Leakage from the drain can be observed by inspecting the Steel collection trough at elev. 75'.

b. Notify engineering immediately if evidence of water leakage is observed.

c. Issue an IR documenting the leakage, with the required action for engineering to evaluate the amount of leakage and any further actions. Evaluation of the leakage should consider the previous understanding of what acceptable leakage may be as agreed by the NRC and documented in the references for (CM-2).

6. REASON FOR REQUEST: LICENSE RENEWAL COMMITMENT
DEFINED IN PASSPORT COMMITMENT TRACKING
AR 00330592.27 07.

7. PCM TEMPLATE REVIEWED; TITLE: NA

8. FREQUENCY: Daily during Refueling Outages

REQUIRED IN MODES: 4,5

9. INITIAL DUE DATE: 1R21

10. INITIAL SCHEDULE CODE / WINDOW: 1R21

11. FOR SCOPE INCREASES, CONCURRENCE OBTAINED FROM
APPLICABLE WORK GROUP MANAGER:
WORK GROUP MANAGER SIGNATURE: Not applicable these are regulatory commitments.

12. COMMENTS (SIGNIFICANT ISSUES / 'YES' (ATTACHMENT 1))

. BASIS / MODIFYING RCM CRITICAL TASK:
. LICENSE RENEWAL COMMITMENT DEFINED IN PASSPORT
. COMMITMENT TRACKING AR 00330592.27.07. and Drywell
Corrosion Monitoring Program commitments.

. 13. SUBMITTED BY SYSTEM MANAGER / PROGRAM ENGINEER / OR
. COMPONENT SPECIALIST: REVIEWED BY: Bob Barbieri

. 14. APPROVED BY PLANT ENGINEERING MANAGER /
. PROGRAMS MANAGER OR CMO SUPERVISOR: Not Required

. PREPARED BY: Ahmed M. Ouaou and revised by Tom Quintenz
DATE: 07/12/06