

RAS 14358

In the Matter of AnaGen Energy Inc., LLC  
 Docket No. SD-0219-L12 Official Exhibit No. Exh. 41  
 OFFERED by: Applicant 130-316  
NRC 13718 (EP)

GPI Nuclear		Technical Functions Safety/Environmental Determination and 50.59 Review (EP-016)	IDENTIFIED on <u>9/20/92</u>	REVIEWED BY <u>DAWN JACOBS</u>	<u>N/A</u>
UNIT <u>Oyster Creek</u>		ACTION TAKEN:	<u>ADMITTED</u>	<u>REJECTED</u>	<u>WITHDRAWN</u>
DOCUMENT/ACTIVITY TITLE <u>Clean and Coat Drywell Ext. in Sand Bed</u>		REPORTER/Clerk <u>DAWN JACOBS</u>	PAGE 1 OF <u>22</u>		
DOCUMENT NO. <u>OC-MM-402950-010</u>		DOC REV. NO. <u>0</u>	SE Rev. No. <u>2</u>		
(if applicable)		SE No. - <u>402950-011</u>			
Type of Activity <u>Modification</u> (Modification, procedure, test, experiment, or document)					
1. Is this activity/document listed in Section I or II of the matrices in Corporate Procedure 1000-ADM-1291.01? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If the answer to question 1 is "no" stop here. (Section IV activities/documents should be reviewed on a case-by-case basis to determine if this procedure is applicable.) This procedure is not applicable and no documentation is required. If the answer is "yes" proceed to question 2.					
2. Is this a new activity/document or a substantive revision to an activity/document? (See Exhibit 3, paragraph 3, this procedure for examples of non-substantive changes) <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If the answer to question 2 is "no" stop here. This procedure is not applicable and no documentation is required. If the answer is "yes" proceed to answer all remaining questions. These answers become the Safety/Environmental Determination and 50.59 Review.					
3. Does this activity/document have the potential to adversely affect nuclear safety or safe plant operations? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No					
4. Does the activity/document require revision of the system/component description in the FSAR or otherwise require revision of the Technical Specifications or any other part of the SAR? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No					
5. Does the activity/document require revision of any procedural or operating description in the FSAR or otherwise require revision of the Technical Specifications or any other part of the SAR? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No					
6. Are tests or experiments conducted which are not described in the FSAR, the Technical Specifications or any other part of the SAR? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No					
No because <u>No tests or experiments are conducted</u>					
Documents checked: If any of the answers to questions 3, 4, 5 or 6 are yes, prepare a written safety evaluation on a Safety Evaluation form. If the answers to 3, 4, 5, and 6 are no, this precludes the occurrence of an Unreviewed Safety Question or Technical Specifications change. Provide a written statement in the space provided above (attach additional sheet if necessary) to support the determination, and list the documents you checked.					
7. Does this document involve any potential Non-Nuclear environmental impact? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No					
8. Are the design criteria as outlined in TMI-1 SDD-T1-000 Div. I or OC-SDD-000 Div. I Plant Level Criteria affected by, or do they affect the activity/document? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No					
If yes, indicate how resolved _____					
If the answer to question 7 is yes, either redesign or provide supporting documentation which will permit Environmental Licensing to determine if an adverse environmental impact exists and if regulatory approval is required (Ref. 1000-ADM-1216.03). If in doubt, consult the Radiological and Environmental Controls Division or Environmental Licensing for assistance in completing the evaluation.					
Signatures			Date		
Engineer/Originator <u>DAWN JACOBS</u> MPR			<u>12/31/92</u>		
Section Manager <u>BRIAN LIPINSKI</u> MPR			<u>12/31/92</u>		
Responsible Technical Reviewer <u>S.D. LESHNOFF</u>			<u>1/5/93</u>		
Other Reviewer(s)					

DOCKETED  
USNRC

October 1, 2007 (10:45am)

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

### 3.3.11 Containment Isolation

With sand removed from the sand bed area and the drywell exterior cleaned and coated, containment isolation is not affected.

During sand removal, cleaning and coating, containment isolation will not be affected. An impact analysis, Reference 3.1.5, identifies limits as to the weight of tools which may be carried or lifted above the torus, as well as the maximum heights at which they may be carried to avoid load drops that might damage the torus or its internal coating. In general, that analysis requires that tools be covered with padding while being moved across the top of the torus. These limits on tool weight, lift height, and padding thickness will be observed during cleaning and coating work. The limits are detailed in OC-MM-402950-009.

### 3.3.12 Materials Compatibility

The drywell exterior surface will be cleaned with a water-based cleaner and coated with epoxy primer and epoxy paint. An epoxy primer will be brushed/poured into the drywell-to-concrete gap at the base of the sand bed area. An epoxy caulk may be applied over any remaining drywell-to-concrete gap that the epoxy primer did not fill. The specific materials to be used are described in OC-MM- 402950-010. These materials have been reviewed for compatibility in this application and approved for use by GPUN's Material Engineering department. The application of these materials will not increase the corrosion rate of the drywell exterior.

## 3.4 Licensing Basis Documents/Margin of Safety

With the sand removed and the drywell exterior cleaned and coated, the margin of safety discussed in SE-000243-002 (Reference 3.1.3) is not reduced.

After the drywell exterior has been cleaned, the steel surface will be free of active corrosion cells so that corrosion will be reduced. Accordingly, it is acceptable to clean but not coat the surface during 14R if time constraints prevent coating application. After the drywell is coated, the steel surface will not be wet by any future water leaks into the sand bed, so that future corrosion will be further minimized. Whether or not the drywell surface is coated during 14R, this modification will make it more likely that the margin of safety will be maintained.

Cleaning and coating in portions of the sand bed area which are difficult to access will be performed on a best effort basis. Accordingly, some patches of the drywell exterior may be left uncleaned and/or uncoated. Possible

preferential corrosion of these unclean/uncoated patches was evaluated. Two conditions may exist in which patches of the drywell exterior are left unclean/uncoated: (1) the patches are unclean/uncoated while the bulk of the drywell exterior is coated or, (2) the patches are unclean/uncoated while the bulk of the drywell exterior is cleaned but not coated. In both cases, the bulk of the drywell will not be cathodic with respect to the unclean/uncoated patches, and therefore, galvanic cells (i.e., preferential corrosion) between the unclean/uncoated patches and the bulk of the drywell exterior is unlikely to exist. It is expected that the unclean/uncoated patches will continue to experience general corrosion, but at a reduced rate since the sand and moisture will no longer be present.

### 3.5 Nuclear Safety/Safe Plant Operation

This modification will have no adverse effect on nuclear safety or safe plant operations. As discussed in Section 3.3.1, the safety functions of the plant systems potentially effected by this modification will not be degraded during and after sand removal, cleaning, and coating.

Sand removal, rust removal and surface preparation tools will vibrate the drywell locally in the sand bed area. Cleaning and coating will not be performed during plant operation, so that there is no potential for this vibration to initiate an inadvertent plant shutdown. Also, based on previous experience with more aggressive tools and cutting activities this vibration will not be severe enough to effect plant equipment.

### 3.6 Probability of Occurrence or Consequence of an Accident

With sand removed and the drywell cleaned and coated in the sand bed area, the probability of occurrence of an accident is not increased.

Neither the probability of occurrence of an accident nor the consequences of an accident will be increased during sand removal, cleaning, and coating activities.

### 3.7 Probability of Occurrence or Consequence of Malfunction of Safety Equipment

For the reasons given in Section 3.3 above, removing sand from the sand bed area and cleaning and coating the drywell steel in the sand bed area will not increase the probability of occurrence or consequence of malfunction of safety equipment.