

RAS 14364

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Exelon Nuclear Issue - Statement of Confirmation

Issue #: 00557180 Originator: KATHY BARNES Submit Date: November 13, 2006

U.S. NUCLEAR REGULATORY COMMISSION

Basic Information

Affected Facility: Oyster Creek
 Dsev Date: 11/07/2006 11:00
 How Discovered Code: H02
 Event Date: 11/07/2006 11:00
 Affected Unit: NA
 Affected Sys: --
 Subject: COMMITMENTS MADE FOR GL 87-05 ARE NOT IN THE RA DATABASE

In the Matter of Amogen Energy Co, LLC
 Docket No. 50-0214-LP Official Exhibit No. Citizens Exhib. 47
 OFFERED by: Applicant/Intervenor
 NRC
 IDENTIFIED on 9/20/07 Panel N/A
 Action Taken: ADMITTED REJECTED WITHDRAWN
 Reporter/Clerk DW

Required Information

Condition Description:

DOCKETED
 USNRC

October 1, 2007 (10:45am)

OFFICE OF SECRETARY
 RULEMAKINGS AND
 ADMINISTRATIVE STAFF

Commitments were made as a result of the GL 87-05 as well as other correspondence, meetings, etc. concerning our Drywell Corrosion Monitoring and Water Intrusion mitigation plans. The correspondence covers the time period of 1986 through present. A check of the Lotus Notes database presently used for commitment tracking did not indicate any commitments have been made. Based on limited research an SER was issued with subsequent correspondence, which committed us to a corrosion monitoring activities and leakage monitoring activities for the Drywell. The correspondence was used to formulate what is thought to be the present commitments for leakage monitoring. That information was utilized as an input to the outage leakage monitoring activities to determine the steps necessary to meet the present commitments and the License Renewal commitments for leakage monitoring. The documents were annotated with reference to the correspondence for the present commitments and to Passport commitment tracking numbers for the License Renewal commitments.

Subsequent research determined other correspondence exists which indicated we initiated "preventive maintenance to clear the sand bed drains periodically". There were no preventive maintenance activities prior to this outage to clear the sand bed drains. It is not known at this time whether this is a commitment by virtue of it being in our correspondence with the NRC. IR 547236 documents the existence of debris in the sand bed drains, when performing the first known formalized maintenance activity to inspect the drains. Although the debris did not affect the capability to monitor the leakage from the sand bed drains, there is a question of where did the debris come from and when should be the next time we inspect the drains, and on what frequency. An ACIT was issued to address these concerns. No

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OCLR00015508

SECY-02

frequency is presented in the previous correspondence found, but there may be other correspondence, which did make commitments to a frequency, or removed this activity. Without having a commitment tracking system for these historical commitments renders the site to potential repeat occurrences of missed commitments from a current license basis perspective.

Immediate actions taken:

License renewal assembled a partial list of documents retrieved from the correspondence database that had been assembled to support the License Renewal Project. Correspondence was discovered relevant to the water intrusion measures including the monitoring of the sand bed drains. Regulatory Assurance was notified of the finding.

This IR was submitted.

Recommendation for action:

1. Perform a complete review of all correspondence relative to the GL 87-05, and the drywell corrosion monitoring and water intrusion mitigation plan for legitimate commitments. Review these commitments for confirmation of implementation. For commitments that are determined to no longer be appropriate, disposition those commitments in accordance with the corporate commitment management procedures.

Assure documents are annotated properly for commitments, which will be retained. Enter those commitments into the commitment tracking system with cross-references to the implementing documents for retrieval purposes. This is required to answer an existing question for the NRC Inspection 2006-13 Report, which is ongoing.

2. Considering the risks associated with missing commitments (examples being: failure to perform leakage monitoring for the sand bed drains, potentially failure to perform periodic clearing of the sand bed drains, etc.) evaluate the need to initiate efforts to retrieve historical commitments, and confirm formal implementation mechanisms exist for those items determined to be legitimate commitments, and that they are being tracked and annotated in accordance with corporate commitment tracking requirements. This would be a significant manpower effort and probably require outside support.

3. Develop and expand the correspondence data base similar to the one which was provided to regulatory assurance from the license renewal project for easy retrieval of the basis documents which provide an input to our Current License Basis (CLB). This would also be beneficial for those performing 50.59 evaluations, which rely on the determination of our CLB.

Supervisor Verbally Contacted J. Kandasamy

Optional Additional Information

What activities, processes, or procedures were involved? During 1R21, NRC Inspections of the drywell water intrusion activities prompted a more extensive search for related correspondence.

Why did the condition happen?

The age of OC has resulted in an enormous volume of regulatory correspondence that had not

What are the consequences?

been reviewed in searching for prior commitments. Commitments were not tracked in a database for all the years of OC operation. Changes of ownership and changes in definition of what constitutes a commitment has resulted in inadequate understanding of what this older correspondence requires.

Any procedural requirements impacted?

Without having a commitment tracking system or proper disposition of these historical commitments renders the site to potential repeat occurrences of missed commitments from a current license basis perspective.

Identify any adverse physical conditions:

LS-AA-110 provides requirements for managing commitments in current regulatory correspondence. This issue report is related to historical commitments made by GPUN.

List of Knowledgeable individuals:

There was no PM established to periodically clear the sand bed drains of clogs.

Is this a repeat or similar condition?

T.Quintenz, H.Ray, P.Tamburro, J.Huffnagel, J.Kandasamy, D.Helker

Yes. There have been other recent examples of missed commitments from "old" correspondence that had not been captured in the OC commitment tracking database. IR 348545 (Tell-tale Drains - Poly bottles not having a PM to monitor DW leakage)

Routing

Owed To Group:

ACAPALL

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CR-OSC