

10 CFR 50.90

RA-08-063  
July 3, 2008

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 Request for Additional Information - Technical Specification Change  
Request No. 374 – Revision to Mechanical Snubber Functional Testing  
Requirements

Reference: Letter from P. B. Cowan (AmerGen Energy Company, LLC) to U.S. Nuclear  
Regulatory Commission, "Technical Specification Change Request No. 374 –  
Revision to Mechanical Snubber Functional Testing Requirements," dated  
October 18, 2007

In the referenced letter, AmerGen Energy Company, LLC (AmerGen) requested a change to the  
Technical Specifications included in Oyster Creek Operating License No. DPR-16. The  
proposed change modifies Technical Specifications (TS) Section 4.5.M.1.e.1 concerning  
Mechanical Snubbers Functional Test Acceptance Criteria, specifically, replacement of the  
snubber breakaway test with the drag force test.

In a discussion with the U.S. Nuclear Regulatory Commission on June 19, 2008, additional  
information was requested. Attached is our response to this request.

If any additional information is needed, please contact Tom Loomis at (610) 765-5510.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 3<sup>rd</sup> of  
July, 2008.

Respectfully,



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

Attachment: Response to Request for Additional Information

Response to Request for Additional Information  
Technical Specification Change Request No. 374  
Revision to Mechanical Snubber Functional Testing Requirements  
July 3, 2008  
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cc: S. J. Collins, Administrator, USNRC Region I  
G. E. Miller, USNRC Project Manager, Oyster Creek  
M. S. Ferdas, USNRC Senior Resident Inspector, Oyster Creek  
Director, Bureau of Nuclear Engineering, New Jersey Department of Environmental  
Protection

**Attachment**

**Response to Request for Additional Information**

### **Response to Request for Additional Information**

Reference: Letter from P. B. Cowan (AmerGen Energy Company, LLC) to U. S. Nuclear Regulatory Commission, "Technical Specification Change Request No. 374 – Revision to Mechanical Snubber Functional Testing Requirements," dated October 18, 2007

#### **Question 1:**

By letter dated October 18, 2007, AmerGen Energy Company, LLC (AmerGen) submitted a license amendment request for the Oyster Creek Nuclear Generating Station (Oyster Creek). The proposed amendment would revise the Oyster Creek Technical Specifications (TSs) by replacing the snubber breakaway test with a drag force test.

The Nuclear Regulatory Commission staff has reviewed the information provided in support of the proposed amendment and finds that the following information is required to complete its review:

- 1) By letter dated October 2, 2002, the NRC authorized an alternative to the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (ASME Code), Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," Article IWF-5000, with regard to visual examination and functional testing of snubbers. The proposed TS change is based on Subsection ISTD of the ASME Code for Operations and Maintenance of Nuclear Power Plants (OM Code). Please clarify this apparent discrepancy or discuss your intent to revise the previously authorized alternative to be consistent with the proposed TS revision.

#### **Response:**

The intent of referencing the current ASME OM Code requirements was only to demonstrate that current ASME OM Code requirements do not require the breakaway test.

Accordingly, the following paragraph is hereby deleted from Section 3.0 ("Background"):

"The current 10 CFR 50.55a(b)(3)(v) permits the use of ASME OM Code, Subsection ISTD, in lieu of ASME Code, Section XI, for the inservice testing of snubbers. Subsection ISTD of the ASME OM-Code, "Preservice and Inservice Examination and Testing of Dynamic Restraints (Snubbers) in Light-Water Reactor Nuclear Power Plants", provides the requirements for snubber testing. 10 CFR 50.55a currently endorses the 2001 Edition through the 2003 Addenda of the ASME OM Code."

In addition, the following paragraph is deleted from Section 5.2 ("Applicable Regulatory Requirements/Criteria"):

"10 CFR 50.55a(b)(3)(v) permits the use of ASME OM Code, Subsection ISTD, in lieu of ASME Code, Section XI, for the inservice testing of snubbers. Subsection ISTD of the ASME OM-Code, "Preservice and Inservice Examination and Testing of Dynamic Restraints (Snubbers) in Light-Water Reactor Nuclear Power Plants", provides the requirements for

snubber testing. 10 CFR 50.55a currently endorses the 2001 Edition through the 2003 Addenda of the ASME OM Code.”

Our TS change was initiated based on the ASME OM Code, which does not require the breakaway test. Revision to the previously authorized alternative will not be necessary.

**Question 2:**

- 2) The proposed TS change would use the ASME OM Code for inservice inspection of mechanical snubbers. Oyster Creek TS 4.3.B references ASME Section XI for inservice inspection of ASME Code Class 1, 2, and 3 systems and components. Please clarify this apparent discrepancy or include a proposed revision to TS 4.3.B to include the ASME OM Code for snubbers.

**Response:**

See response to question 1.

**Question 3:**

- 3) The proposed amendment would change an inservice testing requirement of mechanical snubbers from the ASME Code, Section XI, to the ASME OM Code requirements. All other TS snubber examination and testing requirements remain unchanged, and are based on the ASME Code, Section XI, IWF-5000. Please explain how the proposed change meets the requirements of Title 10 of the *Code of Federal Regulations*, Section 50.55a(g)(4)(iv) which states, in part, "...portions of or addenda may be used provided that all related requirements of the respective editions or addenda are met.

**Response:**

See response to question 1.