

OYSTER CREEK COMMITMENT INSPECTION
Per IP 71003 – App. C MC 2515, Infrequent Procedures
STATUS AND NEXT STEPS
(As of 12/18/08)

G:\DRS\Engineering Branch 1_LicRenewal\Oyster Creek\2008 Outage\InReview\OC Exit Meeting RESULTS on Next Steps.doc

DISCUSSION:

{ (b)(5) } the Deputy Division Director of DRS assigned EB 1 action in order to build consensus in this area by developing and implementing an action plan.] Rxs-

ISSUES:

1. SER App. A No. 27 item (2) (p20): "A strippable coating will be applied to the reactor cavity liner to prevent water intrusion into the gap between the drywell shield wall and the drywell shell during periods when the reactor cavity is flooded."
 - a. The strippable coating initially limited leakage into the cavity drain trough at < 1 gpm.
 - b. On Nov 7, the leakage rate took a step change to 4 to 6 gpm. Water was subsequently identified in 4 sand bed bays (the sand bed bays are air connected to the area between the drywell shield wall and the drywell shell itself).
 - c. This is viewed by the inspector as self revealing.
 - d. NEW INFORMATION:
 - i. Action leakrate calc. did not consider channeling of all flow in one area of the trough causing spill over (~60gpm) as what apparently did occur.
 - ii. Plausible cause – a filtration system was placed in the pool and care was not made to ensure discharge of pump was not aimed at the area where the strippable coating first gave way.
 - iii. In reviewing multiple sections of the SER, it is clear the staff suspected that the strippable coating would NOT prevent leakage AND water WOULD get into the gap for varying reasons, so additional measures were asked for and obtained for additional coating and UT inspections should water in the gap occurred.
 - iv. It is not clear why the statement of future action survived as a lone item on the App. A list of the SER.

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2. SER App. A No. 27 item (3) (p20): "The ... drywell sand bed drains will be monitored (daily during refueling outages) ... if leakage is detected, procedures will be in place to determine the source of leakage and investigate and address the impact of leakage on the drywell shell including verification of the condition of the drywell shell coating and moisture barrier (seal) in the sand bed region and performance of UT examinations of the shell in the upper regions...."
 - a. Daily, the sand bed drains were remotely monitored by checking poly bottles, attached via tygon tubing to funnels hanging below the drain lines.
 - b. The drain lines were not directly observed and in fact, 2 of the 5 tygon tubing became disconnected from the funnels for a period of time which include the leakage period in which the strippable coating started to come loose. The drains to funnel to tygon tubing interface were not readily visible to those monitoring the poly bottles.
 - c. This is viewed by the inspector as licensee identified.

d. NEW INFORMATION:

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3. SER App. A No. 27 item (3) (p20): "The reactor cavity seal leakage trough drains will be monitored for leakage (periodically)." ... it then continues with same statement above on "if leakage is detected..."

- a. The drain line for the trough drain was found isolated during a boroscope examination to verify no line blockage.
- b. When the drain line was monitored at certain times in the outage, the valve was shut. When the strippable coating started to give way, the drain line had been clear with the valve open in order to perform its function and it was being periodically monitored satisfactory.

c. NEW INFORMATION:

i.

When they choose to monitor (periodically), the path was not clear at a certain time in the outage (it is by happenstance that the strippable coating had not broken through during the problem).

ii.

The completed boroscope was done a second time after the cavity had been filled since first boroscope was not completed fully (jam in the last bend) - the frequency for boroscoping is once a refueling cycle, so frequency was met but poorly implemented.

iii.

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NEW INFORMATION APPLICABLE TO ALL THREE ABOVE ISSUES:

The cavity fill procedure using core spray was obtained from the resident inspectors. None of the above conditions are listed in the procedure. Other work instructions apparently cause the actions needed to meet the statements of future action. A debrief on these observation was not done with Amergen.

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LEVEL OF CONSENSUS:

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] IP 71003 section 03.01 b.1 which states,

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in part: "...The inspectors should request assistance from NRR technical staff if the visual observations require intricate knowledge of aging effects to a specific structure" [during the resolution of a particular commitment is stated earlier in the section].

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There are several documents we could look at in order to make a good faith effort.

For the above reasons the following actions are proposed:

1. Continue to review the matter as noted above – target date Jan. 9.
2. Provide status to RA on Dec. 22 – 1000am briefing (DLR and OGC should be involved)
3. Delay the final exit to NLT Jan. 16 (if no resolution by Jan. 14 – URI in order to determine what Amergen really meant and what the SER authors really wanted)
4. Issue report by Feb. 2, 2009
5. Develop answers to key questions in the action plan for generic applicability to plants with renewed licenses – the answers should be discussed along with lessons learned herein at the next license renewal counterpart call and resolutions forward to DLR for interface with NEI (industry) – late January 2009.

Attachment 3A/B/C – Consensus Building Survey for Issue Nos. 1/2/3

1. The purpose of the 71003 is to:

- a. To verify that license renewal commitments, and license renewal commitments revised after the renewed license was granted, are implemented in accordance with 10 CFR 54; and,
- b. Commitments that are not implemented by the licensee, except those the NRC previously agreed could be delayed, deferred, or eliminated, after the extended period of operation commences will be evaluated for NRC enforcement action using Inspection Manual Chapter (IMC) 0308 "Reactor Oversight Process Basis Document", IMC 609 "Significance Determination Process", in keeping with the NRC's "General Statement of Policy and Procedure for NRC Enforcement Actions - Enforcement Policy."

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d. CONSENSUS BUILDING INFORMATION:

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2. The process we are in [2516 (license renewal) vs 2515 (reactor oversight process)] is irrelevant since both processes are relying on IMC 0612, "Power Reactor Inspection Reports" and its connection to 0609, "Significance Determination Process" and the enforcement process. [Officially the IP 71003 was authorized to be done by the ORA in accordance with IM 2515 App. C, Infrequent Procedures.]

a. CONSENSUS BUILDING INFORMATION:

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Pages 5 through 7 redacted for the following reasons:

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