

**John Richmond**

**From:** Richard Conte , *RI*  
**Sent:** Thursday, December 18, 2008 11:25 AM  
**To:** John Richmond  
**Subject:** FW: CONSENSUS BUILDING +++ FW: Characterization of Inadequate Implementation at OC  
**Attachments:** OC Exit Meeting RESULTS on Next Steps.doc

Fruedian slip, how could I forget you.

Dave will be talking to me at 100pm, please come over.

**From:** Richard Conte  
**Sent:** Thursday, December 18, 2008 10:32 AM  
**To:** David Pelton; Mary Baty  
**Cc:** Darrell Roberts; Ronald Bellamy; Timothy Kobetz; Ross Telson; Paul Bonnett; Brian Holian; Samson Lee; Karl Farrar; Scott Barber  
**Subject:** CONSENSUS BUILDING +++ FW: Characterization of Inadequate Implementation at OC

This is for our discussion today at 330 - Region I people to gather in Public Meeting Room.

[ (b)(5) ] *ELJ*

From yesterday, DIRS was instrumental in helping us build process consensus when we decide on the technical issues.

Dave and Mary - really would like to talk beforehand.

You all should have Revision 6 of the exit notes.

**From:** Michael Modes  
**Sent:** Tuesday, December 16, 2008 4:29 PM  
**To:** David Pelton  
**Cc:** Mary Baty; Richard Conte  
**Subject:** Characterization of Inadequate Implementation at OC

[ (b)(5) ] *ELJ*

*N/96*

Pages 2 through 3 redacted for the following reasons:

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From: Richard Conte <Richard.Conte@nrc.gov>  
To: John Richmond <John.Richmond@nrc.gov>  
Date: Thu, 18 Dec 2008 11:25:28 -0500  
Subject: FW: CONSENSUS BUILDING +++ FW: Characterization of Inadequate  
Implementation at OC  
Thread-Topic: CONSENSUS BUILDING +++ FW: Characterization of Inadequate  
Implementation at OC  
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**OYSTER CREEK COMMITMENT INSPECTION**  
**Per IP 71003 – App. C MC 2515, Infrequent Procedures**  
**STATUS AND NEXT STEPS**  
**(As of 12/18/08)**

**DISCUSSION:**

Because of a lack of consensus among key NRC staff stakeholders on the exit notes for the subject inspection, 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.

**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.
    - v. The inspector remains firm that the item was NOT met with minimal to no impact on safety.
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:

- i. None - The inspector remains firm that the item was NOT met with minimal to no impact on safety.
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 boroscopying is once a refueling cycle, so frequency was met but poorly implemented.
    - iii. This is viewed by the inspector as licensee identified ??? (the boroscope method will always identify the issue of the closed valve albeit an inefficient method to identify)??? Not based on timing of when the scoping is done.

**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 Ameraen

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**LEVEL OF CONSENSUS:**

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