

**Nathan Lafferty**

**From:** Richard Conte, *RI*  
**Sent:** Wednesday, January 14, 2009 12:26 PM  
**To:** Neil Sheehan; Doug Tiff  
**Cc:** Nancy McNamara; John Richmond; Richard Barkley; Michael Modes  
**Subject:** RE: Advance copy of OC commitments inspection report and project plan  
**Attachments:** CONTE INPUT FOR 71003 Q.doc

here an electronic version of what I gave Diane you door was closed - the answers are consistent with rev 8 wording. we should deviate too much from that in the report.

you raise some good points on UT below and NJ - branch will work with lead on Comm Plan in this area.

significant and standards are covered by the attached. it would help if you feed Rich B. and my staff will get answers on UT and NJ stuff.

**From:** Neil Sheehan  
**Sent:** Wednesday, January 14, 2009 12:13 PM  
**To:** Doug Tiff  
**Cc:** Nancy McNamara; Richard Conte  
**Subject:** RE: Advance copy of OC commitments inspection report and project plan

Doug,

Here are some questions that come to mind after reading the report:

[Large redacted area]

(b)(5)

*RT/LS*

*N 110*

Neil

**From:** Doug Tift

**Sent:** Friday, January 09, 2009 3:52 PM

**To:** Lisa Regner; David Pelton; Brian Holian; Mary Baty; Edward Williamson; Ed Miller; Karl Farrar; Nancy McNamara; Richard Barkley; Ronald Bellamy; Christopher Newport; Darrell Roberts; Marsha Gamberoni; Richard Conte; Neil Sheehan; Diane Screnci; Michael Modes; John Richmond; Glenn Meyer

**Subject:** Advance copy of OC commitments inspection report and project plan

All,

Attached is the current draft of the Oyster Creek license renewal commitments inspection report and the project plan. This report is to be issued on a tight schedule and we will be request some quick turnaround reviews to help facilitate that schedule.

We are sending the current draft as-is so when we request a 24 hour review, it won't be the first time you see the report. However, if you have any comments on this draft please do not wait, provide your comments to John Richmond.

Thanks in advance for your support. Let me know if you have any questions on the schedule or the report. Again, providing your comments as soon as possible is appreciated.

-Doug

Received: from R1CLSTR01.nrc.gov ([148.184.99.7]) by R1MS01.nrc.gov  
([148.184.99.10]) with mapi; Wed, 14 Jan 2009 12:25:39 -0500  
Content-Type: application/ms-tnef; name="winmail.dat"  
Content-Transfer-Encoding: binary  
From: Richard Conte <Richard.Conte@nrc.gov>  
To: Neil Sheehan <Neil.Sheehan@nrc.gov>, Doug Tift <Doug.Tift@nrc.gov>  
CC: Nancy McNamara <Nancy.McNamara@nrc.gov>, John Richmond  
<John.Richmond@nrc.gov>, Richard Barkley <Richard.Barkley@nrc.gov>, Michael  
Modes <Michael.Modes@nrc.gov>  
Date: Wed, 14 Jan 2009 12:25:38 -0500  
Subject: RE: Advance copy of OC commitments inspection report and project  
plan  
Thread-Topic: Advance copy of OC commitments inspection report and project  
plan  
Thread-Index: AclynBCSOI42j7vpTOGIIE1LQPImCADy1xNAAAFKZtA=  
Message-ID: <2856BC46F6A308418F033D973BB0EE72AA745F1356@R1CLSTR01.nrc.gov>  
References: <2856BC46F6A308418F033D973BB0EE72AA612BFD8B@R1CLSTR01.nrc.gov>  
<2856BC46F6A308418F033D973BB0EE72AA745F133E@R1CLSTR01.nrc.gov>  
In-Reply-To: <2856BC46F6A308418F033D973BB0EE72AA745F133E@R1CLSTR01.nrc.gov>  
Accept-Language: en-US  
Content-Language: en-US  
X-MS-Has-Attach: yes  
X-MS-Exchange-Organization-SCL: -1  
X-MS-TNEF-Correlator:  
<2856BC46F6A308418F033D973BB0EE72AA745F1356@R1CLSTR01.nrc.gov>  
MIME-Version: 1.0

CONTE INPUT FOR 71003 Q&As

Q: This report is odd, it doesn't look like a normal report issued in accordance with ROP guidance (IMC 0612). How do you explain this?

Because an appeal, of a licensing board decision about the Oyster Creek application for a renewed license, is pending before the Commission, the renewed license has not been issued and the proposed license conditions and associated commitments, made as a part of the license renewal application are not in effect. As a consequence the report only records the inspector's observations.

By way of background, the NRC's Reactor Oversight Process mid-cycle letter of September 2, 2008 (ML082470569) informed Exelon that the NRC would be conducting two license renewal inspections prior to the period of extended operation. The NRC conducted the first inspection using the guidance of Inspection Procedure (IP) 71003 "Post-Approval Site Inspection for License Renewal" as a prudent measure to observe Oyster Creek license renewal activities during the last planned refueling outage prior to entering the period of extended operation. The inspection examined important license renewal activities conforming to the Commission's rules and regulations. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel. This inspection focused on the inservice inspection of the drywell containment.

Based on the results of the NRC's inspection, the NRC determined there were no safety significant conditions affecting current operations.

Q: Ok if the license renewal activities needed to be treated in a special way, what is the safety significance of the implementation issues noted? The noted implementation issues are:

1. (b)(5) the strippable coating, applied to the liner of the refueling cavity, and
2. (b)(5) monitor the entire length of former sand bed drain lines, visible from the torus room, and the subsequent discovery that two of the drain lines were not directly attached to the portion of the drain line exiting the concrete shield wall below the former sand bed, and
3. The discovery by boroscopic examination that the reactor vessel refueling cavity trough drain line valve was in the closed position during a portion of time while the drain flow was being monitored and the refuel cavity was flooded.

Et 5  
Et 5

A: Based on the results of the NRC's inspection, the NRC determined there were no safety significant conditions affecting current operations.

As noted in the details of report (sections 2, 3.1, 3.2, 3.3, and 3.4) a few current license basis issues were observed that may require licensee corrective action. Because the issues may be associated with performance deficiencies, an Unresolved Item (URI) is being opened for NRC tracking. After the licensee has had sufficient time to evaluate the issues and determine appropriate corrective actions, the NRC will review the available information to determine if any performance deficiency is potentially more than minor.

Q: Doesn't this report point to the fact that the aging management program for the drywell is inadequate with a frequency of inspection (UT and VT) in light of the conditions found on the epoxy coating (blistering and bumps or unbroken blisters), sand bed region conditions with floor to drywell seal problems and floor epoxy coating cracking problems?

A: Based on the NRC's evaluation of the drywell shell ultrasonic test (UT) thickness measurements, direct observation of drywell shell conditions both inside the drywell, including the floor trenches, and outside the drywell, in the sand bed regions, condition and integrity of the drywell shell epoxy coating, and condition of the drywell shell moisture barrier seals, the NRC determined Exelon provided an adequate basis to conclude the drywell primary containment will remain operable throughout the period to the next scheduled examination, in the 2012 refueling outage.

During the next site visit, the NRC will follow up on Exelon's evaluation and the repair of four small blisters in sand bed bay 11. Exelon stated that some blistering was expected, and would be identified during routine visual examinations. The NRC staff will review Exelon's cause evaluation after it is completed.

The drywell shell epoxy coating and the moisture barrier seal, both in the sand bed region, are barrier systems used to protect the drywell from corrosion. The problems identified and corrected with these barriers had a minimal impact on the drywell steel shell. The projected shell corrosion rate remains very small, as confirmed by the NRC staff review of Exelon's technical evaluations of the 2008 UT data. Based on the NRC's direct observation of the blisters, review of Exelon's repair, and direct observation of drywell shell conditions both inside the drywell and outside the drywell, in the sand bed regions, and the over all condition and integrity of the drywell shell epoxy coating, the NRC determined Exelon provided an adequate basis to conclude the likelihood of additional blisters will not impact the containment safety function during the period until the next scheduled examination, in the 2012 refueling outage.

Q: Describe what is normally done on a 71003 and how was this inspection at Oyster Creek different?

A: IP 71003 consists of a number of site visits to determine the status of license renewal commitment implementation and overall readiness of the licensee to enter the period of extended operations. This was done at the Ginna facility in 2008 (ml no. for report.....) At the time of the reviews, the license had been renewed and many license conditions and associated regulatory commitments were not in effect. However for Ginna, NRC staff observed those license conditions and associated regulatory commitments that need to be done due to outage opportunistic conditions for the plant.

For Oyster Creek the license is not renewed yet and the proposed license conditions and associated regulatory commitments are not in effect yet. The inspection was conducted in an opportunistic way and a prudent measure to observe the implementation of license renewal activities.

Q: Is this it for commitment inspections? Will the licensee enter the period of extended operations without any further NRC review and attention?

The resident inspectors will continue to conduct daily review of plant conditions and as aging management issues arise from the licensee monitoring of aging effects; region based experts will be available to assist.

Those same region based experts will be involved in the next site inspection in March 2009. The NRC will follow up on Exelon's evaluation and the repair of four small blisters in sand bed bay 11. Exelon stated that some blistering was expected, and would be identified during routine visual examinations. The NRC staff will review Exelon's cause evaluation after it is completed along with the above noted unresolved item.

Q: When will the commission rule on the issue in appeal and who issues the renewed license?

The Commission will complete its review when it feels it is ready to decide. Normally the Director of NRR is the licensing authority for license renewal, there may be special direction from the Commission when it decides on the issue in appeal.

Q: Others