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NEI 99-04

RA-09-045

December 9, 2009

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555 - 0001

Oyster Creek Nuclear Generating Station
Facility Operating License No. DPR-16
NRC Docket No. 50-219

Subject: Commitment Change Summary Report – 2008

Enclosed is the Oyster Creek Nuclear Generating Station Commitment Change Summary Report for regulatory commitments changed during the calendar year 2008. The content and format of information submitted in this report is in accordance with the guidance provided by NEI 99-04.

Please contact Cal Taylor at (609) 971-4031 if any further information or assistance is needed.

Sincerely,



Michael J. Massaro
Vice President, Oyster Creek Nuclear Generating Station

Enclosure

cc: S. J. Collins, Administrator, USNRC Region I
G. Edward Miller, USNRC Senior Project Manager, Oyster Creek
J. Kulp, USNRC Senior Resident Inspector, Oyster Creek
RA File No. 09101

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Oyster Creek Nuclear Generating Station 2008 Commitment Change Summary Report

The following NRC commitments (RCMTs) tracked in the Oyster Creek Nuclear Generating Station (OCNGS) commitment-tracking database were changed during the calendar year 2008. These changes were evaluated in accordance with Exelon Procedure LS-AA-110, Commitment Management, and determined to require NRC notification in this Commitment Change Summary Report, consistent with NEI 99-04 guidance.

08-001: Response to NOVs – IR 94-028 and IR 96-008

Original Commitment – (1) Sections for personnel searches have been added to both personnel access and facility access lesson plans. The enhancements provide a detailed sequence for conducting a hands-on search and a search using the hand-held metal detector. Additionally, the proficiency exams have been rewritten to reflect the changes. (2) Ensure all security personnel who are assigned vehicle search duties are re-qualified using the revised examination as stated in the NOV response to IR 96-008-01.

Revised Commitment – The commitments are reclassified from on-going to closed in the administrative tracking database.

Justification – Oyster Creek committed (RCMTs 485800-08 and 485800-41) to training improvements for vehicle searches as a result of two NOVs issued by the NRC. In order to re-establish compliance, OCNGS added sections for personnel searches to lesson plans and proficiency evaluations. As these commitments were to re-establish compliance, they are completed commitments and not on-going commitments as was incorrectly characterized in the commitment tracking database.

08-003: License Renewal Bolting Integrity Aging Management Program

Original Commitment – Procedure ER-AA-2030 is credited for License Renewal for the Bolting Integrity aging management program. Attachment A of ER-AA-2030 (System Walkdown Standards Checklist) originally had the following step to implement this particular commitment, "*No evidence of unusual corrosion or overheating (blister, discoloration)*"

Revised Commitment – ER-AA-2030 Attachment 'A' System Walkdown Standards Checklist is revised and has the following two items to implement this particular commitment, "*No evidence of overheating (blister, discoloration)*" and "*No evidence of corrosion on external surfaces (piping, bolting, equipment/components, etc.).*"

Justification – Actions from a Byron service water leak investigation included revising ER-AA-2030 and changing the acceptance criteria which was originally added for license renewal commitments for Dresden and Quad Cities. The acceptance criterion was

subsequently credited for Oyster Creek license renewal. The requested change struck the word “unusual” from the criteria as a minimum and provided prescriptive guidance to check for corrosion.

08-004 R2: License Renewal – Reactor Pressure Vessel (RPV) Axial Weld Exam Relief

Original Commitment – *Apply for extension of Reactor Vessel Axial Weld Examination Relief for 60-years of operation prior to the period of extended operation.*

Revised Commitment – Commitment was re-characterized under the commitment tracking system as a legal obligation under 10 CFR 50.55a:

If essentially 100% coverage cannot be achieved when performing Reactor Vessel Axial Weld examinations, Oyster Creek Nuclear Generating Station will apply for relief from or for an alternative to ASME Code Section XI requirements, pursuant to 10 CFR 50.55a. This will be done as part of the Inservice Inspection Program on an interval-by-interval basis as required by the Code.

Justification – It is not the NRC’s practice to approve relief from regulatory requirements (such as 10 CFR 50.55a) in advance of the applicant demonstrating the need for and justifying such relief. With new technology, this relief may not be required for the reactor vessel axial weld examinations. Therefore, it would be inappropriate to request such relief prior to entry into the period of extended operation for Oyster Creek (April 2009), which was the original commitment in the license renewal application (commitment 48).

08-005: Human Performance Training for Engineering Personnel

Original Commitment – *Fully implement and provide training on HU-AA-1212, Technical Task Risk/Rigor Assessment Procedure, with all OCNCS Engineering department personnel. The pre-job briefing portion of this process will effectively prevent future events by ensuring that engineering personnel have a full and complete understanding of the requirements of the job.*

Revised Commitment – Commitment is to be re-classified under the commitment tracking system from on-going to one-time and completed.

Justification – This training “DBIG HU-AA-1212” was provided to incumbent engineers to address specific causes noted in the investigation. Currently, new engineers receive human performance training as a part of their Orientation training and any future changes are controlled through the INPO accredited Engineering Support Personnel training process. As these commitments were provided as corrective actions to an NOV, they are completed commitments and not on-going commitments as currently characterized in the commitment tracking database.

08-008: Training on Emergency Plan (E-Plan) Revisions

Original Commitment – *Add the topic of Emergency Plan revision process as an Engineering Support Program (ESP) recurring training subject through the curriculum review committee/ training advisory committee (CRC/TAC) process.*

Revised Commitment – Commitment is to be re-classified under the commitment tracking system from on-going to one-time and completed.

Justification – A number of actions to include training of the engineering organization on the lessons learned were completed. Procedure TQ-AA-1002 “Training Committees” was verified to continue to have a requirement to assure changes such as those to job scope which would include E-Plan changes are considered for potential training needs. As these commitments were provided as corrective actions to an NOV, they are completed commitments and not on-going commitments as currently characterized in the commitment tracking database.