

RA-10-023

August 6, 2010

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

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

Subject: Commitment Change Summary Report – 2009

Enclosed is the Oyster Creek Nuclear Generating Station Commitment Change Summary Report for regulatory commitments changed during the calendar year 2009. 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: Administrator, USNRC Region I  
G. Edward Miller, USNRC Senior Project Manager, Oyster Creek  
J. Kulp, USNRC Senior Resident Inspector, Oyster Creek

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## Oyster Creek Nuclear Generating Station 2009 Commitment Change Summary Report

The following NRC commitments tracked in the Oyster Creek Nuclear Generating Station (OCNGS) commitment-tracking database were changed during the calendar year 2009. 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.

### 09-001: License Renewal Coatings and IWE Programs

Original Commitment and Revised Commitment – The Protective Coating Monitoring and Maintenance Program description of the drywell shell epoxy coating enhancement was revised to simply refer to the commitment as described in the ASME Section XI Subsection IWE Containment Inspection Program in order to capture the commitment to perform future drywell sandbed epoxy coating inspections under one program (IWE) as committed to the NRC. In addition, another enhancement (enhancement 5) already incorporated into the IWE Program (inspection of the seal between the drywell shell and the sand bed region concrete floor) will be added to the Coatings Program commitment for consistency, also.

Justification – The original commitment was credited for an NRC SER decision and has been implemented with 100% inspection of the external drywell coating within the scope of IWE prior to the Period of Extended Operation. OCNGS's commitment to inspect the sandbed region epoxy coating is properly reflected in enhancement 21 of the ASME Section XI, Subsection IWE Containment Inspection Program (Commitment 27), as described in AmerGen letter 2130-07-20464, and the NRC SER. Updating the description of this commitment in the Protective Coating Monitoring and Maintenance Program to refer to the IWE Program for the full description of the commitment simplified and improved the tracking of this committed activity. Updating the description of this commitment in the Coatings Program did not change the activity that OCNGS committed to perform in letter 2130-07-20464 and clarified the commitments that were incorporated into the UFSAR after the renewed license was issued.

### 09-002: Response to B.5.b of the NRC Security Order

Original Commitment and Revised Commitment – Three site-specific items related to the mitigation strategies were revised due to site-specific issues identified during implementation.

Justification – Objectives of the mitigation strategies were maintained with the changes.

09-003: Water leakage discovered between drywell inspections

Original Commitment – For leakages not associated with refueling activities, GPUN will investigate the source of leakage, take corrective actions, evaluate the impact of the leakage and, if necessary, perform an additional drywell inspection about 3 months after the discovery of the water leakage.

Revised Commitment – The 1995 SER commitment clarified in a February 15, 1996, NRC letter has been superseded by License Renewal commitment No. 27 as follows:

The reactor cavity seal leakage trough drains and the drywell sand bed region drains will be monitored for water leakage periodically.

Justification – The 1995 SER commitment is consistent with and has been replaced by License Renewal commitment No. 27.

09-004: Generic Letter 88-20

Original Commitment – Operator actions are defined in abnormal and emergency operating procedures directing the operator to turn Feedwater pumps off on a high RPV water level transient. These actions will be reviewed as part of Licensed Operator Requal Training.

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

Justification – The original commitment was a statement of fact. The action was incorporated into Licensed Operator training programs and is a procedurally required action subject to Appendix B change control processes.

09-006: Buried Piping Inspection

Original Commitment – The program will be enhanced to include:

5) Periodic draining, cleaning, and inspection of the Fire Pond Diesel Fuel Tanks and the Main Fuel Oil Tank. Inspection activities will include the use of ultrasonic techniques for determining tank bottom thicknesses should there be any evidence of corrosion or pitting.

Revised Commitment – Added, “As an alternative to draining, cleaning, and inspecting the Fire Pond Diesel Fuel Tanks, these tanks may be replaced to ensure tank wall thickness is maintained and minimize the introduction of foreign material into the fuel oil system. Any replacement tanks will be procured to the appropriate internal cleanliness standards.”

Justification – This inspection was performed in 2007 for the first time on one of the Fire Pond Diesel Fuel Tanks. Inspection of the tank bottom requires cleaning of the bottom and the removal of fouling and debris that builds up on the bottom. The subsequent bottom inspection was satisfactory. However, shortly after the inspection the associated Fire Diesel was run for surveillance and the engine fuel oil filter clogged. The cleaning activities disturbed the debris in the tank, which then were carried into the fuel supply

since these tanks are small (about 150 gallons) and do not have large openings to allow unimpeded access inside the tank, thorough cleaning, removal of debris, and verification is very difficult. A better way to preserve Fire Pond Diesel operability and avoid a recurrence of this problem is to replace these tanks every 5 years.

09-007: Redundant Fire Water Tank Inspection

Original Commitment – Existing Program is credited. The program will be enhanced to include:

- 4) Visual inspection of the redundant fire water storage tank heater during internal inspections.

Revised Commitment – Existing Program is credited. The program will be enhanced to include:

- 4) Visual inspection of the redundant fire water storage tank heater (tank pressure retaining surfaces) during tank internal inspections.

Justification – The commitment was ambiguous in that it could be interpreted as a required inspection of the heating element surface areas, rather than required inspections of the heater sealing surfaces. The revised wording clarifies the commitment consistent with the intent, which is to inspect pressure boundary components.

09-009: BWRVIP-130, BWR Vessels and Internals

Original Commitment – License Renewal Chemistry Aging Management Program committed to BWRVIP-130, BWR Vessel and Internals Project BWR Water Chemistry Guidelines 2004.

Revised Commitment – Replaced BWRVIP -130 with BWRVIP – 190, BWR Vessel and Internals Project, BWR Water Chemistry Guidelines – 2008 Revision.

Justification – The BWR Water Chemistry Guidelines represent the latest industry experience, knowledge, and strategy in the management of reactor water, ancillary, and support systems chemistry.