

RA-10-079

October 14, 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
Docket No. 50-219

Subject: Supplemental Information Regarding License Amendment Request to Allow Changes to Secondary Containment Boundary During Shutdown Conditions

- References:**
- 1) Letter from Pamela B. Cowan to U.S. Nuclear Regulatory Commission License Amendment Request – Changes to Trunnion Room Secondary Containment Boundary, dated February 25, 2010
 - 2) U.S. Nuclear Regulatory Commission facsimile dated June 18, 2010, Oyster Creek Nuclear Generating Station – Electronic Transmission, Draft Request for Additional Information Regarding License Amendment Request to Allow Temporary Changes to Secondary Containment Boundary During Shutdown Conditions (TAC No. ME3475)
 - 3) Letter from Pamela B. Cowan to U.S. Nuclear Regulatory Commission, Response to Draft Request for Additional Information – License Amendment Request to Allow Changes to Secondary Containment Boundary During Shutdown Conditions, dated July 9, 2010

By letter dated February 25, 2010 (Reference 1), Exelon Generation Company, LLC (Exelon) submitted a request to revise the Oyster Creek Nuclear Generating Station (OCNGS) Technical Specifications (TS) to allow the Reactor Building Secondary Containment associated with the Trunnion Room boundary to be relocated on a temporary basis during Cold Shutdown conditions to support refueling and maintenance outage related activities.

Subsequently, during teleconference discussions between Exelon and U.S. Nuclear Regulatory Commission (NRC) representatives on October 14, 2010, Exelon agreed to provide supplemental information to clarify the proposed wording in the affected Technical Specifications (TS) sections (i.e., TS Definition 1.14, "Secondary Containment Integrity," and the revised TS Surveillance Requirement 4.5.G.3).

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Exelon has concluded that the information provided in this response does not impact the conclusions of the: 1) Technical Analysis, 2) No Significant Hazards Consideration under the standards set forth in 10 CFR 50.92(c), or 3) Environmental Consideration as provided in the original submittal (Reference 1).

There are no regulatory commitments contained in this submittal.

Should you have any questions concerning this letter, please contact Mr. Richard Gropp at (610) 765-5557.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 14th day of October 2010.

Respectfully,



Pamela B. Cowan
Director, Licensing and Regulatory Affairs
Exelon Generation Company, LLC

Attachment: Revised Technical Specifications Pages (Mark-ups)

cc: Regional Administrator - NRC Region I
NRC Senior Resident Inspector - OCNGS
NRC Project Manager, NRR - OCNGS
Director, Bureau of Nuclear Engineering, New Jersey Department of Environmental
Protection

ATTACHMENT

Oyster Creek Nuclear Generating Station

Supplemental Response
License Amendment Request
Changes to Trunnion Room Secondary Containment Boundary
During Shutdown Conditions

Revised Technical Specifications Pages (Mark-ups)

1.0-3

4.5-4

1.14 SECONDARY CONTAINMENT INTEGRITY

Secondary containment integrity means that the reactor building is closed and the following conditions are met:

- A. At least one door at each access opening is closed.
(Note: Momentary opening and closing of the trunnion room door does not constitute a loss of secondary containment integrity. In Cold Shutdown, the trunnion room door may remain open provided the trunnion room is isolated from the secondary containment through the reactor building walls, penetrations and either the inboard or outboard valves to the main steam and feedwater piping being secured in the closed position.)
- B. The standby gas treatment system is operable.
- C. All automatic secondary containment isolation valves are operable or are secured in the closed position.

1.15 (DELETED)

1.16 RATED FLUX

Rated flux is the neutron flux that corresponds to a steady state power level of 1930 MW(t). Use of the term 100 percent also refers to the 1930 thermal megawatt power level.

1.17 REACTOR THERMAL POWER-TO-WATER

Reactor thermal power-to-water is the sum of (1) the instantaneous integral over the entire fuel clad outer surface of the product of heat transfer area increment and position dependent heat flux and (2) the instantaneous rate of energy deposition by neutron and gamma reactions in all the water and core components except fuel rods in the cylindrical volume defined by the active core height and the inner surface of the core shroud.

1.18 PROTECTIVE INSTRUMENTATION LOGIC DEFINITIONS

A. Instrument Channel

An instrument channel means an arrangement of a sensor and auxiliary equipment required to generate and transmit to a trip system a single trip signal related to the plant parameter monitored by that instrument channel.

B. Trip System

A trip system means an arrangement of instrument channel trip signals and auxiliary equipment required to initiate action to accomplish a protective trip function. A trip system may require one or more instrument channel trip signals related to one or more plant parameters in order to initiate trip system action. Initiation of protective action may require the tripping of a single trip system (e.g., initiation of a core spray loop, automatic depressurization, isolation of an isolation condenser, offgas system isolation, reactor building isolation, standby gas treatment and rod block) or the coincident tripping of two trip systems (e.g., initiation of scram, isolation condenser, reactor isolation, and primary containment isolation).

- (3) At least four of the suppression chamber - drywell vacuum breakers shall be inspected. If deficiencies are found, all vacuum breakers shall be inspected and deficiencies corrected such that Specification 3.5.A.5.a can be met.
- (4) A drywell to suppression chamber leak rate test shall be performed once every 24 months to demonstrate that with an initial differential pressure of not less than 1.0 psi, the differential pressure decay rate shall not exceed the equivalent of air flow through a 2-inch orifice.

G. Reactor Building

1. Secondary containment capability tests shall be conducted after isolating the reactor building and placing either Standby Gas Treatment System filter train in operation.
2. The tests shall be performed at the frequency specified in the Surveillance Frequency Control Program and shall demonstrate the capability to maintain a 1/4 inch of water vacuum under calm wind conditions with a Standby Gas Treatment System Filter train flow rate of not more than 4000 cfm.
3. When in Cold Shutdown condition, with the trunnion room door open after the secondary containment boundary has been moved to the penetrations inside the trunnion room and the trunnion room is isolated from the secondary containment in support of outage activities, Standby Gas Treatment System testing shall be performed to demonstrate the capability to maintain a 1/4 inch of water vacuum under calm wind conditions with a Standby Gas Treatment System Filter train flow rate of not more than 4000 cfm.
34. A secondary containment capability test shall be conducted at each refueling outage prior to refueling.
45. The results of the secondary containment capability tests shall be in the subject of a summary technical report which can be included in the reports specified in Section 6.

H. Standby Gas Treatment System

1. The capability of each Standby Gas Treatment System circuit shall be demonstrated by:
 - a. At the frequency specified in the Surveillance Frequency Control Program, after every 720 hours of operation, and following significant painting, fire, or chemical release in the reactor building during operation of the Standby Gas Treatment System by verifying that:
 - (1) The charcoal absorbers remove $\geq 99\%$ of a halogenated hydrocarbon refrigerant test gas and the HEPA filters remove $\geq 99\%$ of the DOP in a cold DOP test when tested in accordance with ANSI N510-1975.