

RA-11-028  
May 16, 2011

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: Supplement to License Amendment Request Regarding Elimination of Daily Testing of an Operable Emergency Diesel Generator (EDG) when the other EDG is Declared Inoperable.

References:

1. Letter from P. B. Cowan, Exelon Generation Company, LLC, to U.S. Nuclear Regulatory Commission, "Technical Specification Change Request No. 356, Elimination of Daily Testing of an Operable Emergency Diesel Generator (EDG) when the other EDG is Declared Inoperable," dated June 25, 2010 (ML101790064).
2. Electronic transmission from G. Edward Miller, U.S. Nuclear Regulatory Commission, to Frank Mascitelli, Exelon Generation Company, LLC, "Oyster Creek Nuclear Generating Station - Electronic Transmission, Draft Request for Additional Information Regarding License Amendment Request to Modify Required Actions for Inoperability of an Emergency Diesel Generator (TAC No. ME4141)," dated September 10, 2010 (ML102530579).
3. Letter from P. B. Cowan, Exelon Generation Company, LLC, to U.S. Nuclear Regulatory Commission, "Response to Draft Request for Additional Information, License Amendment Request Regarding Elimination of Daily Testing of an Operable Emergency Diesel Generator (EDG) when the other EDG is Declared Inoperable," dated October 18, 2010 (ML102920448).

4. Electronic transmission from G. Edward Miller, U.S. Nuclear Regulatory Commission, to Frank Mascitelli, Exelon Generation Company, LLC, "Oyster Creek Nuclear Generating Station - Electronic Transmission, Draft Request for Additional Information Regarding License Amendment Request to Modify Required Actions for Inoperability of an Emergency Diesel Generator (TAC No. ME4141)," dated November 5, 2010 (ML103090567).
5. Letter from P. B. Cowan, Exelon Generation Company, LLC, to U.S. Nuclear Regulatory Commission, "Response to Draft Request for Additional Information License Amendment Request Regarding Elimination of Daily Testing of an Operable Emergency Diesel Generator (EDG) when the other EDG is Declared Inoperable," dated December 1, 2010 (ML103360148).
6. Letter from D. P. Helker, Exelon Generation Company, LLC, to U.S. Nuclear Regulatory Commission, "Supplement to License Amendment Request Regarding Elimination of Daily Testing of an Operable Emergency Diesel Generator (EDG) when the other EDG is Declared Inoperable," dated March 9, 2011 (ML110680504).

In Reference 1, Exelon Generation Company, LLC (Exelon) submitted a request for an amendment to the Technical Specifications (TS), Appendix A of Renewed Facility Operating License No. DPR-16 for Oyster Creek Nuclear Generating Station (OCNGS). The proposed amendment would modify OCNGS TS by eliminating the daily surveillance requirement to test the operable Emergency Diesel Generator (EDG) when the other EDG is declared inoperable. The U.S. Nuclear Regulatory Commission (NRC) reviewed the license amendment request and identified the need for additional information in order to complete their evaluation of the amendment request. A draft request for additional information (RAI) was electronically transmitted to Exelon on September 10, 2010 (Reference 2). Exelon responded to this request on October 18, 2010 (Reference 3). On November 5, 2010, NRC identified the need for additional information that was not related to the previous RAI (Reference 4). Exelon responded to this request on December 1, 2010 (Reference 5). Exelon provided a supplement on March 9, 2011 (Reference 6) to revise the wording to TS 3.7.C.2.d. Subsequently, the NRC identified the need for additional clarification to TS 3.7.C.2.d. on May 2, 2011.

Exelon is submitting this supplement to improve the previously proposed TS 3.7.C.2.d wording to eliminate the possibility of misinterpreting the definition of EDG OPERABILITY. The previously proposed wording could be interpreted to limit the scope of OPERABILITY to satisfying either of the two OR statements whereas the definition of EDG OPERABILITY is more encompassing. By rewording the statement and eliminating the word "by" the resulting action statements will eliminate possible future misinterpretation of the definition/scope of EDG OPERABILITY. TS 3.7.C 2.d has been revised and is included in the attachment to this letter. TS pages 3.7-2, 3.7-2a, and 3.7-3 are final typed pages to support amendment issuance.

The proposed change to the TS Bases provided (for information only) in the Reference 1 submittal is not included in the Attachment to this letter; however, the submitted TS Bases page is still valid, and remains part of the requested license amendment.

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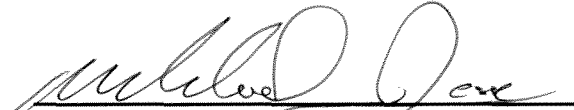
Exelon has concluded that the information provided in this supplement does not impact the conclusions of the: 1) Technical Evaluation, 2) No Significant Hazards Consideration under the standards set forth in 10 CFR 50.92(c), or the 3) Environmental Consideration as provided in the original submittal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

This supplement contains no regulatory commitments.

If you have any questions or require additional information, please contact Frank Mascitelli at 610-765-5512.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 16<sup>th</sup> day of May 2011.

Respectfully,



Michael D. Jesse  
Director - Licensing and Regulatory Affairs  
Exelon Generation Company, LLC

Attachment: Revised Proposed Technical Specification Pages (final typed pages)  
3.7-2, 3.7-2a, and 3.7-3

cc:	Regional Administrator - NRC Region I	w/attachments
	NRC Senior Resident Inspector - OCNGS	"
	NRC Project Manager, NRR - OCNGS	"
	Director, Bureau of Nuclear Engineering, New Jersey Department of Environmental Protection	"
	Mayor of Lacey Township, Forked River, New Jersey	"

**ATTACHMENT**

**License Amendment Request**

**Oyster Creek Nuclear Generating Station  
Docket No. 50-219**

**License Amendment Request Regarding  
Elimination of Daily Testing of an Operable Emergency Diesel Generator (EDG)  
when the other EDG is Declared Inoperable.**

**Revised Proposed Technical Specification Pages (final typed pages)**

**3.7-2**

**3.7-2a**

**3.7-3**

4. Station batteries B and C and an associated battery charger are OPERABLE. Switchgear control power for 4160 volt bus 1D and 460 volt buses 1B2 and 1B3 is provided by 125 VDC Distribution Center DC-B. Switchgear control power for 4160 volt bus 1C and 460 volt buses 1A2 and 1A3 is provided by 125 VDC Distribution Center DC-C.
  5. Bus tie breakers ED and EC are in the open position.
- B. The reactor shall be PLACED IN the COLD SHUTDOWN CONDITION if the availability of power falls below that required by Specification A above, except that
1. The reactor may remain in operation for a period not to exceed 7 days if a startup transformer is out of service. None of the engineered safety feature equipment fed by the remaining transformer may be out of service.
  2. The reactor may remain in operation for a period not to exceed 7 days if 125 VDC Motor Control Center DC-2 is out of service, provided the requirements of Specification 3.8 are met.
  3. The reactor may remain in operation provided the requirements of Specification 3.7.D are met.
- C. Standby Diesel Generators
1. The reactor shall not be made critical unless both diesel generators are operable and capable of feeding their designated 4160 volt buses.
  2. If one diesel generator becomes inoperable during power operation:
    - a. Repairs shall be initiated immediately.
    - b. The reactor may remain in operation for a period not to exceed 7 days.
    - c. During the diesel generator out-of-service period none of the engineered safety features normally fed by the operational diesel generator may be out of service or the reactor shall be placed in the cold shutdown condition.
    - d. Perform the following within 24 hours:
      1. Verify the remaining diesel generator is OPERABLE and not subject to common cause failure,
- OR
2. Operate the remaining OPERABLE diesel generator at least one hour at greater than 80% rated load.

C. Standby Diesel Generators (Continued)

3. If both diesel generators become inoperable during power operation, the reactor shall be placed in the cold shutdown condition.

4. For the diesel generators to be considered operable:

A) There shall be a minimum of 14,000 gallons of diesel fuel in the standby diesel generator fuel tank,

OR

B) To facilitate inspection, repair, or replacement of equipment which would require full or partial draining of the standby diesel generator fuel tank, the following conditions must be met:

1) There shall be a minimum of 14,000 gallons of fuel oil contained in temporary tanker trucks, connected and aligned to the diesel generator fill station.

-AND-

2) The reactor cavity shall be flooded above elevation 117 feet with the spent fuel pool gates removed, or all reactor fuel shall be contained in the spent fuel pool with spent fuel pool gates installed.

AND

3) The plant shall be placed in a configuration in which the core spray system is not required to be OPERABLE.

D. Station Batteries and Associated Battery Chargers

1. With one required station battery B or C charger inoperable:
  - a. Restore associated station battery terminal voltage to greater than or equal to the minimum established float voltage within 2 hours,
  - b. Verify affected station battery float current  $\leq 2$  amps once per 12 hours, and
  - c. Restore station battery charger to OPERABLE status within 7 days.
2. With one or more station B and C batteries inoperable due to:
  - a. One station battery B or C having one or more battery cells float voltage  $< 2.07$  volts, perform 4.7.C.1.a and 4.7.C.1.b for the affected battery within 2 hours and restore affected cell(s) voltage  $\geq 2.07$  volts within 24 hours.
  - b. One station battery B or C float current  $> 2$  amps, perform 4.7.C.1.a for the affected battery within 2 hours and restore affected battery float current to within limits within 12 hours.
  - c. One station battery B or C having one or more cells electrolyte level less than minimum established design limits, if electrolyte level was below the top of the plates restore electrolyte level to above top of plates within 8 hours and verify no evidence of leakage(\*) within 12 hours. In all cases, restore electrolyte level to greater than or equal to minimum established design limits within 31 days.
  - d. One station battery B or C having pilot cell electrolyte temperature less than minimum established design limits, restore battery pilot cell temperature to greater than or equal to minimum established design limits within 12 hours.

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(\*) If electrolyte level was below the top of the plates, the verification that there is no evidence of leakage is required to be completed regardless of when electrolyte level is restored.