UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

June 30, 2011

Mr. Michael J. Pacillo
President and Chief Nuclear Officer
Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: OYSTER CREEK NUCLEAR GENERATING STATION–CLOSEOUT OF GENERIC LETTER 2008-01 "MANAGING GAS ACCUMULATION IN EMERGENCY CORE COOLING, DECAY HEAT REMOVAL, AND CONTAINMENT SPRAY SYSTEMS" (TAC NO. MD7855)

Dear Mr. Pacillo:

On January 11, 2008, the U.S. Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems".[1] The stated purpose of GL 2008-01 was: (a) to request addressees to submit information to demonstrate that the subject systems are in compliance with the current licensing and design bases and applicable regulatory requirements, and that suitable design, operational, and testing control measures are in place for maintaining this compliance; and, (b) to collect the requested information to determine if additional regulatory action is required.

GL 2008-01 requested that licensees provide the following information within 9 months of the date of the GL:

(a) A description of the results of evaluations that were performed pursuant to requested actions specified in the GL. The description was to provide sufficient information to demonstrate that you are or will be in compliance with the quality assurance criteria in Sections III, V, XI, XVI, and XVII of Appendix B to 10 CFR Part 50 and the licensing basis and operating license as those requirements apply to the subject systems;

(b) A description of all corrective actions, including plant, programmatic, procedure, and licensing basis modifications that you determined were necessary to assure compliance with these regulations; and,

(c) A statement regarding which corrective actions were completed, the schedule for completing the remaining corrective actions, and the basis for that schedule.

By letters dated April 11, 2008, September 18, 2008, October 14, 2008, January 20, 2009, and January 28, 2010,[2] Exelon Generation Company, LLC (Exelon or the licensee) provided a response to GL 2008-01. The January 28, 2010, letter provided a response to NRC staff questions in a request for additional information (RAI), which are evaluated below:

[1] Agencywide Documents Access and Management System (ADAMS) Accession No. ML072910759
[2] ADAMS Accession Nos. ML081020758, ML081710787, ML082880706, ML090210304, and ML100290449, respectively

- In RAI 1, the NRC staff questioned void volume determination methods, acceptance criteria, and records. Exelon stated that void volumes are determined using ultrasonic testing (UT) techniques. When voids are discovered, issue reports are generated. The licensee is actively participating in the Nuclear Energy Institute (NEI) gas accumulation team (GAT) and using industry guidance for void acceptance criteria until such time that NRC guidance is available. The NRC staff finds that this is responsive to the GL.

- In RAI 2, the NRC staff questioned the monitoring of pump operation in all modes. Exelon stated that per procedure, systems are verified full before their restoration and return to service. The pumps of the subject systems are monitored from the control room. Additionally, they may be observed and monitored locally during a pump start or on operators' rounds. Flow rate, discharge pressure, and vibration can all be monitored. An issue report would be generated if any of the monitored conditions deviated from what was expected. The NRC staff finds that this is responsive to the GL.

- In RAI 3, the NRC staff requested clarification of the meaning of 'accessible' and 'inaccessible.' The licensee stated that the 'inaccessible' piping was the piping of the subject systems inside the drywell. The licensee completed the walkdown of these piping sections during the fall 2008 refueling outage. The NRC staff finds this responsive to the GL.

- In RAI 4, the NRC staff requested additional information on measures to guard against gas intrusion. The licensee stated that they rely on a competent, trained, qualified, and attentive staff to continually monitor, asses, and control system configuration. A human performance error would result in an issue report to be evaluated in the corrective action program. The NRC staff finds this to be responsive to the GL.

- In RAI 5, the NRC staff questioned what would happen when surveillance criteria are not met. The licensee stated that procedural controls require an IR to be generated and the system declared inoperable and the cause of its noncompliance be evaluated. A failure to meet UT inspection void criteria will result in further evaluation based on as-found conditions. The NRC staff finds this to be responsive to the GL.

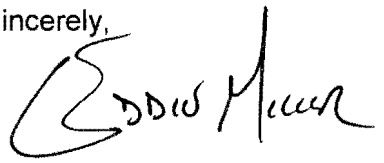
- In RAI 6, the NRC staff requested additional information on work package control. The licensee stated any work package that includes any draining of a GL 2008-01 subject system has an activity for Operations to drain the system. In addition verification of complete filling is required prior to return to service. This is accomplished by UT of the system high points. The NRC staff finds this responsive to the GL.

- In RAI 7, the NRC staff requested additional information on the licensee's training programs. The licensee stated that there is existing training on non-destructive examination that is applicable for those performing the UT inspections. In addition, the licensee is an active participant in the NEI GAT that is working with the Institute of Nuclear Power Operations to develop generic training modules on gas accumulation and management. The licensee plans to evaluate these modules for incorporation into training. The NRC staff finds this to be responsive to the GL.

Based upon the information in Exelon's April 11, 2008, letter and the supplemental information in Exelon's September 18, 2008, October 14, 2008, January 20, 2009, and January 28, 2010, letters, the NRC staff finds Exelon's response to the GL to be acceptable. Consequently, your GL 2008-01 response is considered closed and no further information or action is requested of you. Notwithstanding, an inspection using Temporary Instruction (TI) 2515/177, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems (NRC Generic Letter 2008-01)" (ADAMS Accession No. ML082950666) may be performed by the NRC's Region I staff. TI 2515/177 is confirmatory in nature in that it directs NRC inspectors to selectively verify that the licensee has implemented or is in the process of acceptably implementing the commitments, modifications, and programmatically controlled actions described in the licensee's response to GL 2008-01 and the plant-specific information supports a conclusion that subject systems operability is reasonably ensured.

If you have any questions regarding this letter, please feel free to contact me at (301) 415-2481.

Sincerely,



G. Edward Miller, Project Manager
Plant Licensing Branch I-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-219

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/ra/
G. Edward Miller, Project Manager
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