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10 CFR 50.55a

RA-12-043

April 4, 2012

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: Response to Request for Additional Information - Relief Request to Extend the Fourth Inservice Inspection (ISI) Interval

References:
1) Letter from M. D. Jesse (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission, "Submittal of Relief Request to Extend the Fourth Inservice Inspection (ISI) Interval," dated September 30, 2011

2) Letter from J. G. Lamb (U.S. Nuclear Regulatory Commission) to M. J. Pacilio ((Exelon Generation Company, LLC), "Oyster Creek Nuclear Generating Station – Request for Additional Information Regarding Relief Request to Extend the Fourth Inservice Inspection Interval (TAC No. ME7219)," dated February 6, 2012

In the Reference 1 letter, Exelon Generation Company, LLC (Exelon) requested relief (Relief Request R-41) from the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code, Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," to extend the Inservice Inspection (ISI) interval by three months. The fourth ISI interval is currently scheduled to end on October 14, 2012. In the Reference 2 letter, the U.S. Nuclear Regulatory Commission requested additional information. Attached is our response to that request.

There are no regulatory commitments in this letter.

If you have any questions concerning this letter, please contact Tom Loomis at (610) 765-5510.

Respectfully,

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

Attachment: Response to Request for Additional Information - Relief Request R-41

cc: Regional Administrator, Region I, USNRC
USNRC Senior Resident Inspector, OCNGS
Senior Project Manager [OCNGS] USNRC

Attachment

Response to Request for Additional Information - Relief Request R-41

Question:

1. Identify the examinations that still remain to be completed in order to fulfill the 4th 10-year inspection interval examination requirements by Examination Category, Item Number and quantity.

Response:

The following is the current list of components that remain to be examined in the 4th 10-year inspection interval.

Exam Category	Exam Item No.	Components Examined	Number of Components Remaining
		Class 1	
B-A	B1.12	Reactor Vessel Longitudinal Welds	12
B-A	B1.21	Reactor Vessel Head Circumferential Welds	1
B-A	B1.22	Reactor Vessel Head Meridional Welds	8
B-A	B1.30	Reactor Vessel Shell-to-Flange Welds	1
B-F	B5.10	Reactor Vessel Dissimilar Metal Welds Nozzle-to-Safe End NPS 4" or Greater	5
B-F	B5.20	Reactor Vessel Dissimilar Metal Welds Nozzle-to-Safe End Less Than NPS 4"	1
B-G-1	B6.20	Reactor Vessel Closure Head Studs in Place	32
B-G-1	B6.30	Reactor Vessel Closure Head Studs When Removed	4
B-G-1	B6.40	Reactor Vessel Threads in Flange	32
B-G-1	B6.50	Reactor Vessel Closure Washer, Bushings	64
B-J	B9.11	Piping Circumferential Welds NPS 4" or Greater	31
B-J	B9.21	Piping Circumferential Welds Less Than NPS 4"	2
B-J	B9.40	Piping Socket Welds	11
B-K	B10.10	Welded Attachments for Vessels	8
B-K	B10.20	Welded Attachments for Piping	2
B-K	B10.40	Welded Attachments for Valves	3
B-M-1	B12.40	Pressure Retaining Welds in Valve Bodies	1
B-O	B14.10	Reactor Vessel CRD Housing Welds	3
		Class 2	
C-A	C1.10	Pressure Vessel Shell Circumferential Welds	1
C-B	C2.31	Pressure Vessel Reinforcing Plate Welds to Nozzle and Vessel	2
C-C	C3.10	Welded Attachments for Vessels	4
C-C	C3.20	Welded Attachments for Piping	4
C-C	C3.30	Welded Attachments for Pumps	3
C-F-1	C5.11	Stainless Steel Piping. Piping Circumferential Welds $\geq$ 3/8", Nominal Wall Thickness and > 4" NPS.	6
C-F-2	C5.51	Carbon Steel Piping. Piping Circumferential Welds $\geq$ 3/8", Nominal Wall Thickness and > 4" NPS.	16
		Class 3	
D-A	D1.10	Welded Attachments Pressure Vessels	2
D-A	D1.20	Welded Attachments Piping	2
D-A	D1.30	Welded Attachments Pumps	2

Exam Category	Exam Item No.	Components Examined	Number of Components Remaining
		Component Supports - Class 1, 2 & 3	
F-A	F1.10	Class 1 Piping Supports	14
F-A	F1.20	Class 2 Piping Supports	15
F-A	F1.30	Class 3 Piping Supports	7
F-A	F1.40	Supports other than Piping Supports Class 1, 2, 3	11

Question:

2. The ASME Code (IWA-2430(d)(2)) allows the 5th inspection interval examinations to begin in the same outage that the final 4th inspection interval examinations are completed. This could be done without relief from the requirements of IWA-2430. Yet Relief Request R-41 states that the 5th interval will begin at the end of the requested 4th interval extension. Provide a projected schedule for the 5th interval examinations showing when examination periods would begin and end along with projected outage schedules in the examination periods. Justify why delaying the start of the 5th interval provides an acceptable level of quality and safety.

Response:

The projected schedule for the 5th interval showing when examination periods would begin and end, along with projected outage schedules in the examination periods is provided below. Starting the 5th Interval at the end of the 4th Interval on 01/15/13 will allow for a clean transition between intervals without adding the potential confusion of mixed interval examination requirements, code editions, planning, and crediting. The modified interval start date will also decrease the likelihood of future changes due to any subsequent shifting of outage schedules. The proposed revision does not adversely impact the 5th Interval or change the pattern of outages within the interval or periods. As seen in the chart, 1R25 would be the last outage in the period under either the current or proposed start date, and likewise for 1R29 being the final outage in the interval. Accordingly, the proposed start of the 5th Interval will not modify the outage examination schedules and thus will maintain an acceptable level of quality and safety.

Interval	Period	Outages	
Start Date to End Date	Start Date to End Date	Projected Outage Start Date	Outage Number
5th 01/15/13 to 01/14/23*	1st 01/15/13 to 01/14/16	Scheduled 10/14	1R25
	2nd 01/15/16 to 01/14/20	Scheduled 10/16	1R26
		Scheduled 10/18	1R27
	3rd 01/15/20 to 01/14/23	Scheduled 10/20	1R28
		Scheduled 10/22	1R29

*Although inspection periods for an entire fifth interval are shown, Oyster Creek operations are planned to cease by the end of 2019 as previously announced.