Exelon Generation®

10 CFR 50.54(f)

RS-13-058
RA-13-017

March 19, 2013

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
11555 Rockville Pike
Rockville, MD 20852

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

Subject: Supplemental Response to NRC Request for Information Pursuant to 10 CFR 50.54(f) Regarding the Flooding Aspects of Recommendation 2.3 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident

References:

1. Exelon Generation Company, LLC 180-day Response to NRC Request for Information Pursuant to 10 CFR 50.54(f) Regarding the Flooding Aspects of Recommendation 2.3 of the Near-Term Task force Review of Insights from the Fukushima Dai-ichi Accident, dated November 19, 2012 (RS-12-178)
2. NRC Letter, Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident, dated March 12, 2012

In Reference 1, Exelon Generation Company, LLC (EGC) provided the Oyster Creek Nuclear Generating Station (OCNGS) flooding walkdown report in accordance with the NRC Request for Information (Reference 2). The OCNGS flooding walkdown report documented the plant walkdowns performed to verify that plant features credited in the current licensing basis for protection and mitigation from external flood events are available, functional, and properly maintained. In Table No. 5 of Reference 1, EGC provided the list of the OCNGS plant features that were not able to be inspected due to inaccessibility. EGC committed to complete the inspection of these features classified as restricted access by the end of the OCNGS Refueling Outage OC1R24 (Fall 2012).

This letter provides the results of the completed supplemental walkdown inspections performed for the features classified as restricted access in Reference 1. Additionally, 6 features (Pipe Sleeves 381-386) which do not appear on the B&R 4000 series concrete drawings were found during the walkdown of the Condenser bay and the results are attached to the tables. One feature (24" Pipe Sleeve 147) that was listed in Reference 1 as restricted access was removed, since it was determined to be connected within the intake tunnel and is not an external feature. The enclosed tables document the specific walkdown results for each of the subject plant features.

The results of the visual inspections during the supplemental flooding walkdowns showed that 95 features meet the NEI 12-07 acceptance criteria. Table 1 provides the results for the features that were inspected during the 1R24 Oyster Creek refueling outage immediately judged as acceptable.

Table 2 provides the list of 30 features that were not immediately judged as acceptable during the supplemental walkdowns. The table provides the tracking mechanism for Corrective Action Program (CAP) resolution of the identified conditions.

There were no findings that were found to be deficient per the current licensing basis. The findings that were documented using the CAP will be resolved using the stations corrective action program. No other findings challenge the current licensing basis.

The supplemental flooding walkdown record forms document the details of all observations for all flood features inspected, and are available for on-site review. Except as noted above, OCNGS flood protection features met the NEI 12-07 Supplemental Guidance acceptance criteria and were found to be in accordance with the site current licensing basis.

This letter contains no new regulatory commitments.

Should you have any questions concerning the content of this letter, please contact Ron Gaston at (630) 657-3359.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 19th day of March 2013.

Respectfully,

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

Enclosures:

1. Table 1 – OCNGS Supplemental List of Features Immediately Judged as Acceptable (Restricted Access Features Inspected During Outage 1R24)

2. Table 2 – OCNGS Supplemental List of Features Not Immediately Judged as Acceptable (Restricted Access Features Inspected During Outage 1R24)

cc: Director, Office of Nuclear Reactor Regulation
Regional Administrator - NRC Region I
NRC Senior Resident Inspector – OCNGS
NRC Project Manager, NRR – OCNGS
Manager, Bureau of Nuclear Engineering – New Jersey Department of Environmental Protection
Mayor of Lacey Township, Forked River, NJ

ENCLOSURE 1

Table 1 - OCNGS Supplemental List of Features Immediately Judged as Acceptable (Restricted Access Features Inspected During Outage 1R24)			
#	Feature ID Number	Building	Room
1	2" Conduit Penetration 136	Turbine Building	Condenser Bay
2	2" Conduit Penetration 137	Turbine Building	Condenser Bay
3	2" Conduit Penetration 138	Turbine Building	Condenser Bay
4	4" Conduit Penetration 139	Turbine Building	Condenser Bay
5	2" Conduit Penetration 140	Turbine Building	Condenser Bay
6	2" Conduit Penetration 141	Turbine Building	Condenser Bay
7	2" Conduit Penetration 142	Turbine Building	Condenser Bay
8	4" Conduit Penetration 143	Turbine Building	Condenser Bay
9	4" Conduit Penetration 144	Turbine Building	Condenser Bay
10	4" Conduit Penetration 145	Turbine Building	Condenser Bay
11	4" Conduit Penetration 146	Turbine Building	Condenser Bay
12	2" Conduit Penetration 149	Turbine Building	Condenser Bay
13	2" Conduit Penetration 150	Turbine Building	Condenser Bay
14	2" Conduit Penetration 151	Turbine Building	Condenser Bay
15	2" Conduit Penetration 152	Turbine Building	Condenser Bay
16	4" Conduit Penetration 153	Turbine Building	Condenser Bay
17	4" Conduit Penetration 154	Turbine Building	Condenser Bay
18	4" Conduit Penetration 155	Turbine Building	Condenser Bay
19	4" Conduit Penetration 156	Turbine Building	Condenser Bay
20	4" Conduit Penetration 157	Turbine Building	Condenser Bay
21	4" Conduit Penetration 158	Turbine Building	Condenser Bay
22	4" Conduit Penetration 159	Turbine Building	Condenser Bay
23	4" Conduit Penetration 160	Turbine Building	Condenser Bay
24	4" Conduit Penetration 161	Turbine Building	Condenser Bay
25	4" Conduit Penetration 162	Turbine Building	Condenser Bay
26	4" Conduit Penetration 163	Turbine Building	Condenser Bay
27	4" Conduit Penetration 164	Turbine Building	Condenser Bay
28	4" Conduit Penetration 165	Turbine Building	Condenser Bay
29	4" Conduit Penetration 166	Turbine Building	Condenser Bay
30	4" Conduit Penetration 167	Turbine Building	Condenser Bay
31	4" Conduit Penetration 168	Turbine Building	Condenser Bay
32	4" Conduit Penetration 169	Turbine Building	Condenser Bay
33	4" Conduit Penetration 170	Turbine Building	Condenser Bay
34	4" Conduit Penetration 171	Turbine Building	Condenser Bay
35	4" Conduit Penetration 172	Turbine Building	Condenser Bay
36	4" Conduit Penetration 173	Turbine Building	Condenser Bay
37	4" Conduit Penetration 174	Turbine Building	Condenser Bay

Table 1 - OCNGS Supplemental List of Features Immediately Judged as Acceptable (Restricted Access Features Inspected During Outage 1R24)			
#	Feature ID Number	Building	Room
38	4" Conduit Penetration 175	Turbine Building	Condenser Bay
39	4" Conduit Penetration 176	Turbine Building	Condenser Bay
40	4" Conduit Penetration 177	Turbine Building	Condenser Bay
41	4" Conduit Penetration 178	Turbine Building	Condenser Bay
42	4" Conduit Penetration 179	Turbine Building	Condenser Bay
43	4" Conduit Penetration 180	Turbine Building	Condenser Bay
44	2" Conduit Penetration 193	Turbine Building	Condenser Bay
45	2" Conduit Penetration 194	Turbine Building	Condenser Bay
46	2" Conduit Penetration 195	Turbine Building	Condenser Bay
47	2" Conduit Penetration 196	Turbine Building	Condenser Bay
48	4" Conduit Penetration 198	Turbine Building	Condenser Bay
49	4" Conduit Penetration 199	Turbine Building	Condenser Bay
50	4" Conduit Penetration 200	Turbine Building	Condenser Bay
51	4" Conduit Penetration 201	Turbine Building	Condenser Bay
52	4" Conduit Penetration 204	Turbine Building	Condenser Bay
53	4" Conduit Penetration 205	Turbine Building	Condenser Bay
54	4" Conduit Penetration 206	Turbine Building	Condenser Bay
55	4" Conduit Penetration 207	Turbine Building	Condenser Bay
56	10" Pipe Sleeve 208	Turbine Building	Condenser Bay
57	16" Pipe Sleeve 209	Turbine Building	Condenser Bay
58	3" Pipe Sleeve 210	Turbine Building	Condenser Bay
59	16" Pipe Sleeve 211	Turbine Building	Condenser Bay
60	16" Pipe Sleeve 212	Turbine Building	Condenser Bay
61	Pipe Sleeve 381	Turbine Building	Condenser Bay
62	Pipe Sleeve 382	Turbine Building	Condenser Bay
63	Pipe Sleeve 383	Turbine Building	Condenser Bay
64	Pipe Sleeve 384	Turbine Building	Condenser Bay
65	Pipe Sleeve 385	Turbine Building	Condenser Bay
66	Pipe Sleeve 386	Turbine Building	Condenser Bay
67	4" Conduit Penetration 213	Turbine Building	Condenser Bay
68	4" Conduit Penetration 214	Turbine Building	Condenser Bay
69	4" Conduit Penetration 215	Turbine Building	Condenser Bay
70	4" Conduit Penetration 216	Turbine Building	Condenser Bay
71	4" Conduit Penetration 346	Turbine Building	Condenser Bay
72	4" Conduit Penetration 347	Turbine Building	Condenser Bay
73	4" Conduit Penetration 348	Turbine Building	Condenser Bay
74	4" Conduit Penetration 349	Turbine Building	Condenser Bay
75	Manhole Cover 243	Turbine Building	Condenser Bay
76	Manhole Cover 244	Turbine Building	Condenser Bay

Table 1 - OCNGS Supplemental List of Features Immediately Judged as Acceptable (Restricted Access Features Inspected During Outage 1R24)			
#	Feature ID Number	Building	Room
77	4" Conduit Penetration 230	Turbine Building	Steam Jet Air Ejector Room
78	4" Conduit Penetration 231	Turbine Building	Steam Jet Air Ejector Room
79	4" Conduit Penetration 232	Turbine Building	Steam Jet Air Ejector Room
80	4" Conduit Penetration 233	Turbine Building	Steam Jet Air Ejector Room
81	4" Conduit Penetration 234	Turbine Building	Steam Jet Air Ejector Room
82	4" Conduit Penetration 235	Turbine Building	Steam Jet Air Ejector Room
83	4" Conduit Penetration 236	Turbine Building	Steam Jet Air Ejector Room
84	4" Conduit Penetration 237	Turbine Building	Steam Jet Air Ejector Room
85	4" Conduit Penetration 238	Turbine Building	Steam Jet Air Ejector Room
86	4" Conduit Penetration 239	Turbine Building	Steam Jet Air Ejector Room
87	4" Conduit Penetration 240	Turbine Building	Steam Jet Air Ejector Room
88	4" Conduit Penetration 241	Turbine Building	Steam Jet Air Ejector Room
89	SJAE/High-Low Room East Wall	Turbine Building	Steam Jet Air Ejector/High-Low Rooms
90	SJAE South Wall	Turbine Building	Steam Jet Air Ejector Room
91	40" Pipe Sleeve 001	Turbine Building	Steam Jet Air Ejector Room
92	40" Pipe Sleeve 002	Turbine Building	Steam Jet Air Ejector Room
93	Rectangular Penetration 3 x 1'-6" 003	Turbine Building	Steam Jet Air Ejector Room
94	3" Pipe Sleeve (plant ground penetration)	Reactor Building	East Wall
95	4" Conduit 331	Diesel Generator Building–DG2	DG2 Cable Trench

ENCLOSURE 2

Table 2: OCNGS Supplemental List of Features Not Immediately Judged as Acceptable

(Restricted Access Features Inspected During Outage 1R24)

#	Feature ID #	Description	Observation	Component Operability	Resolution
1	4" Conduit 310 (1)	Conduit Penetration Seal	No seal could be observed for this penetration	**Yes** – Documented in IR 01442056. See discussion in Resolution column	Water that gets into the open conduits will drain into either the drain in the cable trench, or into the Turbine Building basement. IR 01406841 [see above] documents that water from the DG1 conduits draining into the TB basement does not challenge plant operability. Water in the conduits will not challenge the operability of EDG 1
2	4" Conduit 311 (1)	Conduit Penetration Seal	No seal could be observed for this penetration		
3	4" Conduit 313 (1)	Conduit Penetration Seal	No seal could be observed for this penetration		
4	4" Conduit 327 (1)	Conduit Penetration Seal	No seal could be observed for this penetration	**Yes** – Documented in IR 01442053. See discussion in Resolution column	Water that gets into the open conduits will drain into either the drain in the cable trench, or into the Turbine Building basement. IR 01405765 [see above] documents that water from the DG1 conduits draining into the
5	4" Conduit 328 (1)	Conduit Penetration Seal	No seal could be observed for this penetration		
6	4" Conduit 329 (1)	Conduit Penetration Seal	No seal could be observed for this penetration		
7	4" Conduit 330 (1)	Conduit Penetration Seal	No seal could be observed for this penetration		
8	4" Conduit 332 (1)	Conduit Penetration Seal	No seal could be observed for this penetration		

Table 2: OCNGS Supplemental List of Features Not Immediately Judged as Acceptable

(Restricted Access Features Inspected During Outage 1R24)

#	Feature ID #	Description	Observation	Component Operability	Resolution
9	4" Conduit 334 (1)	Conduit Penetration Seal	No seal could be observed for this penetration	**Yes –** Documented in IR 01442053. See discussion in Resolution column	TB basement does not challenge plant operability. Water in the conduits will not challenge the operability of EDG 2
10	6" Pipe Sleeve 135 (1)	Pipe Penetration Seal	Due to an obstructed view, an internal seal for this pipe sleeve could not be verified.	**Yes** – See discussion in Resolution column.	Work Order WO M2313037 was amended to seal this pipe sleeve on the inside of the plant. A walkdown on 11/16/2012 verified that the new seal is in place and meets NEI and CLB criteria.
11	4" Conduit Penetration 181 (1)	Conduit Penetration Seal	These penetrations are corroded, and have staining on the wall below them.	**Yes –** Documented in IR 01441159	Trend will be tracked in ongoing ER-OC-450 Structural Monitoring walkdowns.
12	4" Conduit Penetration 182 (1)	Conduit Penetration Seal			
13	4" Conduit Penetration 185 (1)	Conduit Penetration Seal			
14	4" Conduit Penetration 186 (1)	Conduit Penetration Seal			
15	4" Conduit Penetration 183 (1)	Conduit Penetration Seal	There is staining on the wall below these penetrations.		
16	4" Conduit Penetration 184 (1)	Conduit Penetration Seal			
17	4" Conduit Penetration 187 (1)	Conduit Penetration Seal			

Table 2: OCNGS Supplemental List of Features Not Immediately Judged as Acceptable

(Restricted Access Features Inspected During Outage 1R24)

#	Feature ID #	Description	Observation	Component Operability	Resolution
18	4" Conduit Penetration 188 (1)	Conduit Penetration Seal			
19	4" Conduit Penetration 189 (1)	Conduit Penetration Seal		**Yes** – Documented in IR 01441159	Trend will be tracked in ongoing ER-OC-450 Structural Monitoring walkdowns.
20	4" Conduit Penetration 190 (1)	Conduit Penetration Seal			
21	4" Conduit Penetration 191 (1)	Conduit Penetration Seal			
22	4" Conduit Penetration 192 (1)	Conduit Penetration Seal			
23	18" Pipe Sleeve 197 (1)	Pipe Penetration Seal	Corrosion on penetration and signs of water seepage on wall.		
24	4" Conduit Penetration 202 (1)	Conduit Penetration Seal	These two penetrations are covered by a catch and inaccessible. There is staining on the wall below the catch.		
25	4" Conduit Penetration 203 (1)	Conduit Penetration Seal			
26	20" Pipe Sleeve 217 (1)	Pipe Penetration Seal	Staining on penetration and signs of water seepage on wall.		
27	Rectangular Penetration 3 x 1'-6" 148 (1)	Penetration Seal	There is staining at the construction joints of this penetration, and immediately below	**Yes** – Documented in IR 01441129	Trend will be tracked in ongoing ER-OC-450 Structural Monitoring walkdowns.
28	Rectangular Penetration 3'6" x 3'6" 218 (1)	Penetration Seal	There are cracks greater than 0.04" wide in the grout sealing this penetration, and there is slight staining below various pipes.	**Yes** – Documented in IR 01442048	Trend will be tracked in ongoing ER-OC-450 Structural Monitoring walkdowns.
29	Condenser Bay floor (1)	Wall	There are cracks greater than 0.04" in width in the structural concrete floor slab.	**Yes** – Documented in IR 01441118	Trend will be tracked in ongoing ER-OC-450 Structural Monitoring walkdowns.

Table 2: OCNGS Supplemental List of Features Not Immediately Judged as Acceptable

(Restricted Access Features Inspected During Outage 1R24)

#	Feature ID #	Description	Observation	Component Operability	Resolution
30	West Wall Turbine Building Condenser Bay (1)	Floor Slab	There are cracks greater than 0.04" in width in the structural concrete wall.	**Yes** – Documented in IR 01441116	Trend will be tracked in ongoing ER-OC-450 Structural Monitoring walkdowns.