

Distel, David J:(GenCo-Nuc)

From: Hughey, John <John.Hughey@nrc.gov>
Sent: Wednesday, May 06, 2015 2:32 PM
To: Distel, David J:(GenCo-Nuc)
Subject: Oyster Creek Extension Request.

Dave,

Below are the pertinent technical issues which remain that the NRC staff desires to discuss regarding the Oyster Creek Vent Order compliance date relaxation:

1. As stated in the RAI responses from 11/25/14, the 8" existing vent pipe inside the Reactor Building has not been evaluated for seismic loads. And, the existing 10" pipe outside the Reactor Building is only equipped with "anti-falldown pipe supports". As such, the existing vent has not been shown to be "robust". The calculation that is on the ePortal for 049 compliance (OC-MISC-010) also includes opening the containment vent at 35psig, and the 6-month updates from 8/28/14 and 2/27/15 specify the use of containment venting as a part of the 049 strategies in accordance with the EPG/SAG Rev.3. This issue pertains to both Orders (049 and 109).
2. The existing vent pipe discharges its effluent into the main plant stack. Combustible gases in the stack (or potentially being discharged into the reactor building in the event of the failure of the piping as discussed above) have not been evaluated or addressed in the information provided to date.

Pertinent information since the issuance of the Phase 2 guidance

1. Similar to Phase 1 RAIs, the staff will be evaluating Oyster Creek's request against the technical guidance of NEI 13-02, Rev. 1, as endorsed by ISG-2015-01. As such, the licensee should provide a discussion of the differences between Oyster Creek's Phase 2 hardware and procedural strategies during the period of extension and the requirements of Sections B.1 and B.2 of Order EA-13-109. Utilize information from NEI 13-02, Rev.1, Section 1.2, *HCVS Guiding Principles*, as appropriate. This discussion may include any proposed compensatory measures.
2. If hardware and procedural strategies described as Option 1 (SAWA) or Option 2 (SAWA with SAWM) of NEI 13-02, Rev.1, Section 1.2, *HCVS Guiding Principles*, are to be employed during the period of extension, the licensee should provide a discussion of the capabilities of Oyster Creek's hardware and procedural strategies as compared to the guidance of NEI 13-02, Rev. 1, Appendix C, *Severe Accident Water Management*, and Appendix I – *Severe Accident Water Addition*. This discussion may also include any proposed compensatory measures.

Thanks,
John

John Hughey

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