

## **NRR-DMPSPEm Resource**

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**From:** Lamb, John  
**Sent:** Wednesday, January 03, 2018 10:36 AM  
**To:** 'david.helker@exeloncorp.com'  
**Cc:** Richard.Gropp@exeloncorp.com; 'David.Distel@exeloncorp.com'  
**Subject:** For Your Action - RAI - Oyster Creek BWRVIP LAR (CAC NO. MG0180; EPID No. L-LLA-2017-0304)

**Importance:** High

Dear Mr. Helker:

By letter dated January 7, 2011 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML 110070507), Exelon Generation Company, LLC (Exelon or the licensee), submitted its Notification of Permanent Cessation of Power Operations for Oyster Creek Nuclear Generating Station (OCNGS). In this letter, Exelon provided notification to the U.S. Nuclear Regulatory Commission (NRC) of its intent to permanently cease power operation no later than December 31, 2019.

By letter dated August 30, 2017 (ADAMS Accession No. ML 17242A211), Exelon submitted a license amendment request to implement the latest NRC-approved version of BWRVIP-18, which provides inspection and evaluation guidelines for core spray piping, spargers, and associated components. The latest NRC-approved version of BWRVIP-18 is BWRVIP-18, Revision 2-A (ADAMS Accession No. ML16302A123), which contains the NRC's final safety evaluation (SE) of BWRVIP-18, Revision 2, dated February 22, 2016 (ADAMS Accession No. ML16011A190). The NRC staff has determined additional information is required to enable the NRC staff to make an independent assessment regarding its technical review.

The enclosure to this email provides the request for additional information (RAI). On November 20, 2017, the draft RAI questions were sent to Messrs. Richard Gropp, and Paul Bonnet of your staff to ensure that they were understandable, the regulatory bases for the questions were clear, and to determine if the information was previously docketed. A teleconference was held on January 3, 2018, with Mr. Dave Distel of your staff to clarify the RAI questions. Exelon stated they would respond to the RAI within 45 days of the date of this email.

If you have any questions, please contact me at 301-415-3100 or via e-mail at [John.Lamb@nrc.gov](mailto:John.Lamb@nrc.gov).

Sincerely,

John G. Lamb, Senior Project Manager  
Special Projects and Process Branch  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-219

Enclosure:  
Request for Additional Information

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**ENCLOSURE**

## REQUEST FOR ADDITIONAL INFORMATION (RAI)

By application to the U.S. Nuclear Regulatory Commission (NRC) dated August 30, 2017 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML17242A211), Exelon Generation Company, LLC (Exelon or the licensee) requested changes to the facility operating license for the Oyster Creek Nuclear Generating Station (OCNGS), pursuant to Title 10 of the *Code of Federal Regulations* Part 50 (10 CFR 50), Section 50.90 “Application for amendment of license, construction permit, or early site permit.” Specifically, the licensee proposed to change its License Condition 2.C.(5) of the OCNGS renewed operating license DPR-16 (ADAMS Accession No. ML052720204) to implement the latest NRC-approved version of BWRVIP-18, which provides inspection and evaluation guidelines for core spray piping, spargers, and associated components. The latest NRC-approved version of BWRVIP-18 is BWRVIP-18, Revision 2-A (ADAMS Accession No. ML16302A123), which contains the NRC’s final safety evaluation (SE) of BWRVIP-18, Revision 2, dated February 22, 2016 (ADAMS Accession No. ML16011A190). The NRC staff requires responses to the following requests for additional information (RAIs) to complete the review of the licensee’s license amendment request.

### **RAI 1**

In Section 3.0, “Technical Evaluation,” of Attachment 1 of the application, in the subsection titled “OCNGS Inspection History of Reactor Internals Core Spray Piping and Spargers,” the licensee stated that no new cracking was identified associated with the core spray spargers and piping since the December 2, 1999 NRC safety evaluation of the original version of BWRVIP-18. The NRC staff requests the licensee to clarify that “no new cracking” means no reportable indications. The NRC staff defines “no reportable indications” here as indications that do not require evaluation per Section 5 “Evaluation Methodologies” of BWRVIP-18, Revision 2-A and that do not challenge the structural integrity (i.e., indications due to fabrication process) of the core spray spargers or piping, or both.

### **RAI 2**

In Section 3.0 of Attachment 1 of the application, in the subsection titled “OCNGS Inspection History of Reactor Internals Core Spray Piping and Spargers,” the licensee stated that, for the P4a welds, no similar welds are currently defined as cracked in accordance with the inaccessible weld program of BWRVIP-18, Revision 2-A, but did not provide details on how it identified the similar accessible welds and what the similar welds are. Section 3.4.3 “Identification of Similar Accessible Weld Populations” of BWRVIP-18, Revision 2-A provides guidance for plant-specific evaluation of similar accessible welds. Therefore, the NRC staff requests the licensee for details of how it identified the similar accessible welds according to the guidance in Section 3.4.3 of BWRVIP-18, Revision 2-A, and to indicate which welds are similar to the P4a welds.

### **RAI 3**

Section 3.4 “Inspection Program for Inaccessible Welds” of BWRVIP-18, Revision 2-A states that for BWR-2 designs, such as OCNGS, inaccessible welds include thermal sleeve welds, in addition to P4a and P9 welds. In Section 3.0 of Attachment 1 of the application, in the subsection titled “OCNGS Inspection History of Reactor Internals Core Spray Piping and Spargers,” the licensee discussed how it implemented the BWRVIP-18, Revision 2-A inaccessible weld program for the P4a and P9 welds. However, the licensee did not include a discussion of its implementation of the inaccessible weld program of BWRVIP-18, Revision 2-A for the thermal sleeve welds of the core spray system at OCGNS. Therefore, the NRC staff requests the licensee to discuss its implementation of the inaccessible weld program of BWRVIP-18, Revision 2-A for the thermal sleeve welds, including how it identified the similar accessible welds according to the guidance in Section 3.4.3 of BWRVIP-18, Revision 2-A, and to indicate which welds are similar to the thermal sleeve welds.

### **RAI 4**

In Section 3.0 of Attachment 1 of the application, in the subsection titled “Implementation of BWRVIP-18, Revision 2 – Quality and Reporting Requirements,” the licensee stated that reporting requirements are in accordance with the OCGNS license renewal commitment, which includes reference to BWRVIP-94, “BWR

Vessel and Internals Project, Program Implementation Guide,” Revision 2. The NRC staff requests the licensee to clarify or confirm that the reporting requirements in BWRVIP-94, Revision 2 for inspection results and flaw evaluations discussed in Attachment 1 of the application are consistent with those associated with the version of BWRVIP-18 approved by the NRC in December 2, 1999, which is the version in the current OCGNS License Condition 2.C.(5). Explain inconsistencies, if any.

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**Mail Envelope Properties** (John.Lamb@nrc.gov20180103103600)

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