



# Exelon Generation®

Oyster Creek Nuclear Generating Station  
741 Route 9 South  
Forked River, NJ 08731

NEI 99-04

RA-18-106

December 21, 2018

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: Commitment Change Summary Report – 2018

Enclosed is the Oyster Creek Nuclear Generating Station Commitment Change Summary Report for regulatory commitments during calendar year 2018. This report is being submitted in accordance with the guidance provided by NEI 99-04.

Please contact Don Schroetter at (609) 971-4226 if any further information or assistance is needed.

Sincerely,

for

Jeffery P. Dostal  
Site Decommissioning Director  
Oyster Creek Nuclear Generating Station

Attachment – Summary of Commitment Changes

cc: Administrator, USNRC Region I  
USNRC Project Manager, Oyster Creek  
USNRC Decommissioning Inspector, Oyster Creek

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NRR

**Attachment**  
**Summary of Commitment Changes**

The following U.S. Nuclear Regulatory Commission (NRC) commitments tracked in the Oyster Creek Nuclear Generating Station (OCNGS) commitment-tracking database were changed during the calendar year 2018. These changes were evaluated in accordance with Exelon Generation Company, LLC (Exelon) Procedure LS-AA-110, "*Commitment Management*," and determined to require NRC notification in this Commitment Change Summary Report, consistent with the guidance provided in NEI 99-04, "*Guidelines for Managing NRC Commitments*."

**Commitment Change 18-001: SAMG Response**

**Original Commitment** - Oyster Creek Nuclear Generating Station will update the site SAMGs to future revisions of the BWROG generic severe accident technical guidelines, and the SAMGs will be integrated with other emergency response guideline sets and symptom-based Emergency Operating Procedures, and validated, using the guidance in NEI 14-01, "Emergency Response Procedures and Guidelines for Beyond Design Basis Events and Severe Accidents."

**Justification** - This commitment can be closed based on implementation of Permanently Defueled Technical Specifications (PDTs) and supporting NRC-approved License Amendment Request (reference ML17320A411). Per the PDTs there is no longer a reactor core; therefore, entry into SAMG is not credible.

**Commitment Change 18-002: PASS System**

**Original Commitment** – Establish a capability for classifying fuel damage events at the Alert level threshold. 2. Develop contingency plans for obtaining and analyzing highly radioactive samples of the reactor coolant, suppression pool, and containment atmosphere. 3. Maintain an I-131 site survey detection capability, including an ability to assess radioactive iodine released to offsite environs, by using effluent monitoring systems or portable sampling equipment.

**Justification** - This commitment can be closed based on implementation of PDTs and supporting NRC-approved License Amendment Request (reference ML17320A411). Per the PDTs there is no longer a reactor core.

**Commitment Change 18-003: Electrical Distribution System Functional Inspection**

**Original Commitment** – This change refers to commitment to Assess results of maintenance 7 testing of Rotary and Static Chargers. Develop PM request and test procedures as appropriate based on assessment.

**Justification** - This commitment can be closed based on implementation of PDTs and supporting NRC-approved License Amendment Request (reference ML17320A411). PDTs have no offsite electrical supply requirements.

Commitment Change 18-004: FRCT Aging Management Program

Original Commitment - Oyster Creek License Renewal Application (OCLRA) Appendix A.5 (as appended by the 11/11/05 supplemental response to RAI 2.5.1.19-1) establishes the commitment for the Aging Management Program (AMP) for Periodic Inspection Program - FRCT. OCLRA Appendices A and B (as appended by the 11/11/05 supplemental response to RAI 2.5.1.19-1) provide further details concerning this commitment. The Program Basis Document for this AMP supplements this discussion.

Justification - This commitment can be closed based on implementation of PDTS and supporting NRC-approved License Amendment Request (reference ML17320A411). PDTS have no offsite electrical supply requirements.

Commitment Change 18- 005: Voltage Regulators Tracking

Original Commitment - Procedure 106 was revised; A voltage band was established to ensure that the existing degraded grid design bases were satisfied, accounting for the Induction Regulators. The switchyard tour frequency was increased from weekly to daily. The operator logs were revised to identify the acceptable voltage regulator bands. Future operability determinations for the S/U Transformers will include the Induction Regulators. Procedure 681.4.005 replaced the substation tour sheet portion of Procedure 106 on 11/19/03. (updated by DIF);  
Update on 09/05/2005 by DIF, added Procedure 337 as an affected document per CAP O2005-2152.  
Ref. IR 97-006: INTEGRATED INSPECTION 07/07 - 08/24/97

Justification - This commitment can be closed based on implementation of PDTS and supporting NRC-approved License Amendment Request (reference ML17320A411). PDTS have no offsite electrical supply requirements.

Commitment Change 18-006: License Renewal Commitment Closure

The following commitments (Table-1) were processed for closure due to the permanent shutdown of OCNCS and defueling of the reactor vessel.

Table-1

Tracking #	Commitment
00330592-01-00	A.1.01 Commitment ASME Section XI In-service Inspection, Subsections IWB, IWC, and IWD (B.1.1)
00330592-03-00	A.1.03 Commitment (Reactor Head Closure Studs (B.1.3))
00330592-04-00	A.1.04 Commitment (BWR Vessel ID Attachment Welds (B.1.4))
00330592-05-00	A.1.05 Commitment (BWR Feedwater Nozzle (B.1.5))
00330592-06-00	A.1.06 Commitment (BWR CRD Return Line Nozzle (B.1.6))
00330592-07-00	A.1.07 Commitment (BWR Stress Corrosion Cracking (B.1.7))
00330592-08-00	A.1.08 Commitment (BWR Penetrations (B.1.8))
00330592-09-00	A.1.09 Commitment (BWR Vessel Internals (B.1.9))
00330592-10-00	A.1.10 CM (Therm. Aging and Neutron Irrad. Embr. of CASS (B.1.10))
00330592-11-00	A.1.11 Commitment (Flow-Accelerated Corrosion (B.1.11))
00330592-18-00	A.1.18 Commitment (BWR Reactor Water Cleanup (B.1.18))
00330592-23-00	A.1.23 Commitment (Reactor Vessel Surveillance (B.1.23))
00330592-27-00	A.1.27 Commitment (ASME Section XI, Subsection IWE (B.1.27))
00330592-28-00	A.1.28 Commitment (ASME Section XI, Subsection IWF (B.1.28))
00330592-29-00	A.1.29 Commitment (10 CFR Part 50, Appendix J (B.1.29))
00330592-37-00	A.2.1 CM (Periodic Testing of Containment Spray Nozzles (B.2.1))
00330592-44-00	A.3.1 Commitment (Metal Fatigue of RC Pressure Boundary)
00330592-55-00	A.1.37 CM (Periodic Monitoring CT PP - Electrical (B.1.37))

Original Commitment- Implementation of License Renewal Programs as listed in Table-1. Closure of License Renewal Program Commitments as listed on Table-1 due to permanent defueling of the reactor, and commitments to enter decommissioning.

Justification - Letters from Exelon Generation Company, LLC (Exelon) to the NRC "Certification of Permanent Cessation of Power Operations for Oyster Creek Nuclear Power Station," dated February 14, 2018 (RA-18-017) and "Certification of Permanent Removal of Fuel from the Reactor Vessel," dated September 25, 2018 (RA-18-083) committed Exelon to cease operation after shutdown on 9/17/18. With the fuel out of the reactor and an requirement to remain permanently defueled and never operate the reactor again, the current technical specifications do not require the reactor systems and reactor safety systems to remain in service. A collegial review of the License Renewal Program Commitments listed on the Attachment by Operations, Engineering, and Regulatory Assurance personnel validated that the systems involved are no longer required based current and decommissioned plant conditions. Therefore, the commitments listed in Table 1 are closed.

Commitment Change 18-007: License Renewal Commitment Closure

The following commitments (Table-2) were processed for closure due to the implementation of PDTS.

Table-2

Tracking #	Commitment
00330592-17-00	A.1.17 Commitment (Compressed Air Monitoring (B.1.17))
00330592-22-00	A.1.22 Commitment (Fuel Oil Chemistry (B.1.22))
00330592-33-00	A.1.33 CM (Protective Coating Monitoring and Maintenance (B.1.33))
00330592-39-00	A.2.3 CM (Generator Stator Water Chemistry Activities (B.2.3))
00330592-45-00	A.3.2 Commitment (Environmental Qualification Program (B.3.2))
00330592-58-00	A.1.12A Commitment (Bolting Integrity – FRCT (B.1.12A))
00330592-59-00	A.1.14A PM (Closed-Cycle Cooling Water System – FRCT (B.1.14A))
00330592-60-00	A.1.21A Commitment (Aboveground Steel Tanks – FRCT (B.1.21A))
00330592-61-00	A.1.22A Commitment (Fuel Oil Chemistry – FRCT (B.1.22A))
00330592-62-00	A.1.24A Commitment (One-Time Inspection – FRCT (B.1.24A))
00330592-63-00	A.1.25A CM (Selective Leaching of Material – FRCT (B.1.25A))
00330592-64-00	A.1.26A Commitment (Buried Piping Inspection – FRCT (B.1.26A))
00330592-65-00	A.1.38 Inspection Internal Surfaces Pipe/Duct - FRCT (B.1.38)
00330592-66-00	A.1.39 Commitment (Lube Oil Analysis Program – FRCT (B.1.39))
00330592-68-00	A.1.26B Buried Piping and Tank - Met Tower Fuel (B.1.26B)

Original Commitment- Implementation of License Renewal Programs as listed on Table-2. Closure of License Renewal Program Commitments as listed on Table-2 due to permanent defueling of the Reactor, and commitments to enter decommissioning.

Justification: The commitments listed in the Table 2 are closed based on implementation of PDTS and supporting NRC-approved License Amendment Request (reference ML17320A411). Per the PDTS the functions of the License Renewal Programs listed in the attachment are no longer required. A collegial review of the License Renewal Program Commitments listed on the Attachment by Operations, Engineering, and Regulatory Assurance personnel validated that the systems are no longer in service per the PDTS.

Commitment Change 18-008: MOV Program

Original Commitment- OCNGS plans to continue participating in the JOG MOV-Periodic Verification Program as a member of the Boiling Water Reactor Owner's Group and plans to implement the program elements described in Topical Report NEDC-32719, Revision 2. Closure of this commitment due to permanent defueling of the Reactor and implementation of the Permanently Defueled Technical Specifications.

Justification - This commitment can be closed based on implementation of Permanently Defueled Technical Specifications (PDTs) per License Amendment Request (reference ML17320A411). Per the PDTs there are no longer Safety Related Motor Operated Valves used at Oyster Creek during Decommissioning.

#### Commitment Change 18-009: ECCS Fill and Vent

Original Commitment Performance of UT inspections should be considered for ECCS systems to ensure proper fill and vent has been achieved.

- Incorporate the following aspects is station Fill and Vent procedures:  
Ensure procedures are revised to include best practice F&V techniques – for example, how long should the operator have a steady stream of water, and are all of the vents that should be manipulated called out in the procedure, is the venting sequence optimal, if dynamic venting/system sweeps are used - are the procedures accurate...  
UT at warranted locations after the F&V is complete to verify system is water solid prior to restoration of operability.
- If a site cannot have the applicable F&V procedures revised prior to the submittal, then actions (Corrective Maintenance Work Orders) need to be in place to ensure this occurs until the procedures are revised

Justification - This commitment can be closed based on implementation of PDTs and supporting NRC-approved License Amendment Request (reference ML17320A411). Per the PDTs there is no longer a reactor core or ECCS systems.

#### Commitment Change 18-010: ERO Drill

Original Commitment - OCNGS will perform a drill to confirm the ability of the post-shutdown ERO to perform the necessary functions of each emergency response facility and to utilize the post-shutdown procedures being developed depicting the revised assignment of duties. State and local response organizations will be offered the opportunity to participate, and the NRC and FEMA will be provided advance notice and the opportunity to observe drill activities.

In addition, other training drills will be conducted to train post-shutdown station ERO members.

Justification - Confirmed with station Emergency Preparedness (EP) Manager that all post-shutdown Emergency Response Organization (ERO) personnel have either had a table top exercise or have participated in the full-scale ERO Drill conducted 8/15/18 for the post-shutdown organization. The 8/15/18 drill was observed by two NRC inspectors with no deficiencies noted. The NRC observations are noted in the Resident Inspector's 3<sup>rd</sup> quarter 2018 report. The Drill was also observed by representatives for the New Jersey Bureau of Nuclear Engineering and Office of Emergency Management with no deficiencies noted. The Federal Emergency Management Agency (FEMA) was afforded the opportunity to observe the Drill and chose not to participate.