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November 26, 1990
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U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Gentlemen:

Subject: Oyster Creek Nuclear Generating Station (OCNGS)
Docket No. 50-219
License No. DPR-16
Oyster Creek Drywell Containment

References: (1) NRC letter dated October 3, 1990 - Summary of September 19, 1990 meeting

(2) NRC letter dated October 16, 1990 - Requested Clarifications

On Wednesday, September 19, 1990, a meeting was held with the NRC at the NRC offices, One White Flint North, Rockville, Maryland. The purpose of this meeting was to discuss GPUN's overall plan to address the drywell corrosion issue at the Oyster Creek Nuclear Generating Station. The Reference (1) letter documents the participants, morning and afternoon presentations and summarizes the significant items discussed.

The NRC requested detailed supplemental information supporting GPUN's assessment be submitted no later than December 31, 1990.

The requested information specified by Reference (2) consists of the following four (4) items:

(1) Drywell Inspection Plan Details (original and augmented) which includes justification of Sampling Techniques and Statistical Methodology.

(2) Point-By-Point Code Comparison justifying ASME Section III, NE Methodology for the ASME Section VIII Drywell/Containment Vessel.

(3) Structural Design Report justifying operation to 14R refueling outage based on ASME Section III, NE Methodology using 62 psig as drywell design pressure.

(4) GPUN Actions to prevent leakage into the drywell gap and the effects of leakage on other structures or equipment.

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In order to expedite NRC review of the requested information, individual submittals will be provided as the documentation of each item is finalized.

Attachment I to this letter provides the information requested by the NRC for Item (1) and includes a brief summary of the overall drywell inspection plan and the following technical documentation.

- GPUN TDR 948, Rev. 1, "Statistical Analysis of Drywell Thickness Data."
- GPUN Specification IS-[illegible]8227-004, Rev. 8, "Functional Requirements for Drywell Containment Vessel Thickness Examination."
- GPUN Calculation C-130[illegible]-187-5300-011, Rev. 0, "Statistical Analysis of Drywell Thickness Data from 4/24/90" (Appendices 6.1 to 6.3 not attached).
- GPUN TDR 1027, Rev. 1, "Design of a UT Inspection Plan for the Drywell Containment Using Statistical Inference Methods."
- GPUN Specification IS-402950-001, Rev. 0, "Functional Requirement for Augmented Drywell Inspection."

It is GPUN's goal to provide submittal items (2) through (4) as they become available but no later than December 31, 1990. GPUN will, of course, inform the NRC of any changes to the corrosion assessment which would compromise our technical justification for continued operation of the OCNGS.

If you have any questions on this submittal or the overall drywell corrosion program, please contact Mr. Michael Laggart, Manager, Corporate Nuclear Licensing at (201) 316-7968.

Sincerely,

J. C. DeVine, Jr.
Vice President, Technical Functions

JCD/RZ/plp
Attachment
cc's on next page

cc: Administrator
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ATTACHMENT I

SUMMARY OF GPUN OVERALL DRYWELL INSPECTION PLAN

The GPUN drywell inspection plan is separated in two portions. The first portion is an inspection program intended to determine corrosion rates which are utilized to develop conservative projections.

In this portion of the program, UT inspections are performed over time at the same specific locations. The inspections are performed during outages of opportunity when a drywell entry is made for reasons other than program inspections. 20 priority #1 locations are inspected not more frequently than 3 months, and 7 priority #2 locations are inspected not more frequently than 18 months. These inspection locations were identified during detailed inspection of elevations 11'-3", 50'-2", 51'-10" and 87-5" conducted in 1986, 1987 and 1990. During the 13R outage, GPUN will perform inspection of all priority #1 locations, once at the beginning of the outage and once at the end of the outage. Included in this attachment are copies of the GPUN internal reports which provide details of data collection and data reduction, as well as the most recent results for inspection up to April 1990. Also provided is Specification IS-328227-004, Rev. 8 which presents functional requirements for inspection implementation.

The second portion of the program will be implemented for the first time during the 13R outage and is intended to statistically confirm required drywell thicknesses. This portion of the program relies on UT inspection of 57, 6 x 6 inch randomly chosen locations. The resulting inspection data will characterize the condition of the upper elevations of the drywell.

As part of this Attachment are copies of a GPUN Report which provides details of how the amount and the location of the 57 inspection locations were determined and Specification IS-402950-001 which presents functional requirements for this augmented inspection implementation in 13R.

ATTACHMENT 1 (CONTINUED)
TECHNICAL DOCUMENTATION

- GPUN TDR 948, Rev. 1, "Statistical Analysis of Drywell Thickness Data."
- GPUN Specification IS-328227-004, Rev. 8, "Functional Requirements for Drywell Containment Vessel Thickness Examination."
- GPUN Calculation C-1302-187-5300-011, Rev. 0, "Statistical Analysis of Drywell Thickness Data from 4/24/90" (Appendices 6.1 to 6.3 not attached).
- GPUN TDR 1027, Rev. 1, "Design of a UT Inspection Plan for the Drywell Containment Using Statistical Inference Methods."
- GPUN Specification IS-402950-001, Rev. 0, "Functional Requirement for Augmented Drywell Inspection."