

GPU Nuclear Corporation

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January 17, 1992 C321-92-2020 5000-92-2094

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

Gentlemen:

SUBJECT: Oyster Creek Nuclear Generating Station (OCNGS)

Facility Operating License No. DPR-16

Docket No. 50-219

Oyster Creek Drywell Containment

References:

- (1) NRC Letter dated September 3, 1991 "OCNGS Position on Evaluation of Structural Integrity of a Degraded Steel Containment (TAC No. M79166)."
- (2) GPUN Letter C321-91-2276 dated October 9, 1991 "Oyster Creek Drywell Containment."
- (3) NRC Letter dated November 19, 1991 "OCNGS Clarification of Staff Position on Evaluation of Structural Integrity of a Degraded Steel Containment (TAC No.M79166)."

Reference 1 provided the NRC staff position on the evaluation of the structural integrity of a degraded steel containment for the Oyster Creek Nuclear Generating Station (OCNGS). GPU Nuclear's response was provided in Reference 2, including our position regarding the application of ASME III Subsection NE-3213.10. Reference 3 provides a clarification of the staff's position and acknowledges that GPU Nuclear and NRC have different views regarding the application of the ASME Code on this matter.

The attached diagram of the drywell (GPUN Dwg. 3E-187-29-001) is submitted in response to your request. The schedule on this drawing identifies the 27 priority 1 and 2 UT locations we have been tracking for several years, along with the 57 random UT locations utilized for the statistical inspection conducted during 13R. Also tabulated are the thickness readings and associated primary membrane stresses at each of these locations. The schedules are organized by elevation (6 foot, 23 foot, 50 foot, etc.). Mark numbers on the drawings correspond to plate numbers, also as tabulated.

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UT reading locations are indicated by different sympols, as identified by the Legend on the right-hand side of the drawing. In all cases, the thicknesses listed are the readings taken during 13R, in May 1951 for the priority 1 and 2 locations, and in April 1991 for the 57 random locations.

Also shown on the attached diagram are "A" scan elevations. "A" scan measurements were taken at three elevations at six-inch intervals completely around the vessel on all accessible areas. The individual "A" scan readings are not tabulated on the drawing, but the priority 1 and 2 locations include the thinnest areas found by "A" scan inspection.

In aggregate, these data summarized on the attached drawing reflect a very extensive and statistically solid drywell examination program. To date, more than ten thousand individual UT measurements of the drywell thickness have been taken.

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

Very truly yours,

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

cc: Administrator, Region I NRC Resident Inspector Oyster Creek NRC Project Manager

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