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

Gentlemen:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
Response to Generic Letter 88-11, "NRC Position on Radiation Embrittlement of Reactor Vessel Materials and its Impact on Plant Operations" dated July 12, 1988.

The subject generic letter transmitted a copy of Revision 2 to Regulatory Guide 1.99, "Radiation Embrittlement of Reactor Vessel Materials" which became effective in May 1988. The letter stated that the Revision 2 will be used by the NRC in reviewing submittals regarding pressure - temperature (P-T) limits and for analyses other than presurized thermal shock (PTS) that require an estimate of the embrittlement of reactor vessel beltline materials. The letter also stated that licensees should submit the results of their technical analysis and a proposed schedule for whatever actions they propose to take.

On January 19, 1988 GPUN submitted new P-T operating curves for operation beyond ten (10) effective full power years (EFPY). The new P-T curves were developed based on the surveillance capsule results and on the draft Rev. 2 of Regulatory Guide 1.99. The new curves were approved by the NRC staff and were issued on March 21, 1988 as Amendment No. 120 to Oyster Creek Technical Specifications. Safety Evaluation written by the NRC staff for Amendment 120 concludes that "the licensee has applied appropriately Regulatory Guide 1.99, draft Rev. 2, 10CFR50 Appendix G, and Standard Review Plan 5.3.2 to calculate the adjusted RT_{NDT} and to develop the pressure-temperature curves."

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GPUN has recently completed evaluation of P-T limits using the calculational methods identified in the final Rev. 2 of Reulatory Guide 1.99. The results indicate that the impact on the Oyster Creek P-T curves is a 4°F increase at 15 EFPY. The Amendment 120 curves were developed using an Adjusted Reference Temperature (ART) of 125°F. As a result of the recent evaluation, the ART estimated for 15 EFPY is now 129°F.

It is projected that 15 EFPY will be reached toward the end of the second quarter in 1994 (approximately middle of Cycle 14). Therefore, another set of P-T curves will be generated and submitted by the end of 13R.

Very Truly yours,

D. K. Croneberger
Acting Director
Technical Functions

RFW/crb

cc: Regional Administrator
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