

From: [Longmire, Pamela](#)
To: a.sterdis@holtec.com
Cc: [Snyder, Amy](#)
Subject: OCNCS" LAR: PDTS revision to reflect permanent SNF removal from SFP
Date: Wednesday, June 2, 2021 6:36:42 PM
Attachments: [image003.png](#)

Hi Andrea.

As you know, I am the Decommissioning PM for Oyster Creek while Zahira is on rotation. I am reaching out to you because I am trying to resolve comments on the Safety Evaluation Report. To that end, I am seeking your assistance in resolving these comments. We can have a clarifying phone call sometime tomorrow or you could respond to this email and then follow-up with a clarifying phone call tomorrow. I will be available anytime after 10:00 am EDT until COB. Inasmuch as I believe I understand what is being conveyed I just would not want to venture a guess but prefer to have the author to clarify their own message. I could issue a RAI but I believe this is such a simple matter that it really does not warrant issuing a RAI. I believe this method to be much more expeditious.

COMMENT RESOLUTION:

Your submittal dated March 16, 2021 (ADAMS Accession No. ML21075A337) contained the following language (or concept) that was used in the Safety Evaluation Report. The comments to be resolved appear as bullets following the highlighted text.

License Condition 2.C.(16)

The licensee proposed to delete this license condition in its entirety. This license condition involves management of license renewal application (LRA) commitments. The purpose of these LRA commitments was to ensure that the aging effects of equipment important to the safe operation of the reactor are managed so that the functionality of SSCs are maintained during the facility's period of extended operation. In letter dated March 9, 2009 (ADAMS Accession No. ML090720894), Exelon documented that it had completed implementation of commitments that were required by April 2009 for Oyster Creek and entering the period of extended operation.

For a permanently shutdown facility where all spent fuel has been located within the ISFSI, most of the equipment subject to aging management programs are no longer in use and functionality does not need to be maintained. However, during decommissioning some equipment, such as for equipment related to the fire protection system to address fire events that could result in radiological hazards per the requirements of 10 CFR 50.48(f), may be required beyond the permanent cessation of operations and therefore may be subject to an aging management program.

- This section is a little confusing and hard to follow. We say here that equipment related to fire protection may be required beyond permanent cessation of operations. But later we conclude that there is no equipment needing aging management. We also say that these commitments were moved to the DSAR.

Please clarify how fire equipment aging management is being handled here. Was it moved to the DSAR?

Prior to cessation of operations, Oyster Creek LRA commitments for aging management were incorporated into Appendix A, "Defueled Safety Analysis Report Supplement (Aging Management)", of the DSAR, which is updated in accordance with 10 CFR 50.71(e). Changes to these license renewal commitments continue to be evaluated and controlled pursuant to the change review requirement criteria identified 10 CFR 50.59 and 10 CFR 50.71(e). **On this basis, the NRC staff has previously found that update and or removal of license renewal commitments identified in the DSAR acceptable per the established controls provided for maintaining the DSAR.**

- Was this a previous amendment? If so please add the date and ML# for the amendment.

There is no other equipment meeting the requirements of the aging management program that is needed in the ISFSI only facility condition. The spent fuel storage cask systems located in an ISFSI are subject to their own Certificate of Compliance and Cask Technical Specification requirements. These cask protection requirements are not referenced or identified by License Condition 2.C.(16). On this basis, the NRC staff finds the deletion of the aging management license condition acceptable.

- See comment above. Is fire equipment aging management an issue? If so, how is it being handled.

Pam

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