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April 13, 2000
1940-00-20096

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

Dear Sir:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
Deletion of the Generic Letter 88-01 Augmented Inservice Inspection
Requirements for The Reactor Water Cleanup System

By Reference 4 in Attachment I, the USNRC denied a request from the Oyster Creek Nuclear Generating Station to revise the Augmented Inservice Inspection Program. The revision would have deleted the inspection requirements for the portion of the Reactor Water Cleanup (RWCU) System outboard of the second containment isolation valves. The staff acknowledged that the upgrades to the valve control circuitry for Generic Letter 89-10 concerns were complete. However, the denial was based on the design of the RWCU Isolation valves, as affected by Electric Power and Research Institute (EPRI) testing. Further, the letter specified that:


"GPU's request may be resubmitted after this new issue concerning the performance of the subject gate valves under blowdown conditions has been resolved."

The requisite valve internal modifications were completed during our last refueling outage (17R). As the basis for the NRC denial has been addressed, GPU Nuclear, Inc. requests the Augmented Inservice Inspection Program be revised to remove all inspection requirements for the portion of the RWCU system outboard of the second containment isolation valves.

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Attachment I to this cover letter provides the history and status of the RWCU isolation valves. If any additional information or assistance is required, please contact Mr. John Rogers of my staff at 609.971.4893.

Very truly yours,

A handwritten signature in black ink, appearing to read "Sander Levin", with a stylized, flowing script.

Sander Levin, Acting Site Director
Oyster Creek Nuclear Generating Station

SL/JJR
Attachment

cc: Administrator, Region I
NRC Project Manager
Senior Resident Inspector

Attachment I

Background

Generic Letter 88-01 (Ref. 1) was issued to provide the NRC's position regarding IGSCC in BWR stainless steel piping, including applicability and inspection frequencies. The GL requirements applied to stainless steel piping, 4" nominal pipe size (NPS) and larger, exposed to coolant temperatures above 200°F during power operation, regardless of Code classification. At Oyster Creek, this included the Reactor Water Cleanup (RWCU) piping outside the second CIV. The piping is stainless steel, 6" NPS, and is exposed to reactor coolant above 200°F up to the first heat exchanger. There are about 85 welds in the inlet and outlet portions of the RWCU system.

In 1992, NRC issued Supplement 1 to GL 88-01 (Ref. 2). The supplement provided acceptable alternative staff positions to some of those delineated in GL 88-01. Included in the supplement were alternatives with regard to the inspection of RWCU system piping outboard of the containment isolation valves. The staff acknowledged that the radiation levels associated with inspection of RWCU system piping outboard of the containment isolation valves were very high, and that this portion of the system was designed to be isolable and was generally classified as non-safety piping. But, as the piping is susceptible to IGSCC, the staff concluded that until the actions associated with GL 89-10 (Ref. 3) on motor-operated valves (MOVs) were completed by licensees, an inspection of the subject piping on a sampling basis of at least 10 percent of the weld population should be performed during each refueling outage to ensure the structural integrity of the piping.

Oyster Creek has been requesting exemption of the RWCU piping outside the second CIV because of high dose, the complete lack of cracking found during any of the inspections, and effective hydrogen water chemistry (HWC). However, the staff last denied our request to exempt these welds from the GL 88-01 program requirements, because we had not yet resolved the issue concerning the performance of the containment isolation valves under blowdown conditions (assuming a postulated pipe break outside the second containment isolation valves) (Ref. 4).

In 1998, GPUN submitted a request (Ref. 5) to defer inspections of a number of welds in the GL 88-01 program, since, at the time, GPUN was planning to run Oyster Creek for only one more cycle, then entering into decommissioning of the plant. Part of the deferral request included welds in the RWCU system outside the second containment isolation valve. The basis for deferral included the fact that we were modifying the motor-operated containment isolation valves during 17R to ensure they would be able to perform their intended isolation function under blowdown conditions. NRC granted our request via a Safety Evaluation (Ref. 6), which included reference to our commitment to modify the valves.

Current Status

The modifications to the RWCU motor-operated valve bodies were completed in 17R (1998). Therefore, there is reasonable assurance that these valves will perform their intended isolation function, even under postulated blowdown conditions (i.e., a pipe break outside the second containment isolation valve). As such, per GL 88-01, Supplement 1, we request approval to discontinue inspections of the RWCU welds outside the second containment isolation valves, and to remove these welds from the scope of the Oyster Creek GL 88-01 program.

For completeness, it is also inherent in this request that the RWCU welds, which were deferred from the 17R outage (to the 18R outage), be removed from the scope of the GL 88-01 program.

References

1. Generic Letter 88-01, "NRC POSITION ON IGSCC IN BWR AUSTENITIC STAINLESS STEEL PIPING," January 25, 1988
2. Generic Letter 88-01, SUPPLEMENT 1, "NRC POSITION ON INTERGRANULAR STRESS CORROSION CRACKING (IGSCC) IN BWR AUSTENITIC STAINLESS STEEL PIPING," February 4, 1992
3. Generic Letter 89-10, "SAFETY-RELATED (1) MOTOR-OPERATED VALVE TESTING AND SURVEILLANCE," June 28, 1989 (also includes Supplements 1 through 7)
4. NRC letter to GPU Nuclear, "Review of Intergranular Stress-Corrosion Inspection Plan of RWCS piping Welds Outboard of the Primary Containment Isolation Valves," September 26, 1996. (TAC 93315)
5. GPU Nuclear letter to NRC, "Request for Approval of Alternate 17R Outage Inspections Related to Generic Letter 88-01 Intergranular Stress Corrosion Cracking (IGSCC) Commitments," July 29, 1998.
6. NRC letter to GPU Nuclear, "Reduced Scope of Intergranular Stress Corrosion Cracking (IGSCC) Inspection for Oyster Creek Nuclear Generating Station During Refueling Outage 17 (TAC No. MA2417)," October 14, 1998.