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10 CFR 50
10 CFR 51
10 CFR 54

RA-08-008
January 14, 2008

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

Oyster Creek Generating Station
Facility Operating License No. DPR-16
NRC Docket No. 50-219

Subject: Commitment Clarifications Related to the Aging Management Program for the Oyster Creek Drywell Shell, Associated with AmerGen's License Renewal Application (TAC No. MC7624)

Reference: Initial Decision from the Atomic Safety and Licensing Board (ASLB) Associated with Oyster Creek Nuclear Generating Station License Renewal Proceeding, dated December 20, 2007 (LBP-07-17)

The ASLB conducted a hearing on September 24 and 25, 2007, on a single contention related to AmerGen Energy Company LLC's (AmerGen's) application for a renewed operating license for the Oyster Creek Nuclear Generating Station (Oyster Creek). The ASLB issued its "Initial Decision," referenced above, in December 2007.

In its decision, and as discussed at the hearing, the ASLB acknowledged that AmerGen intends to perform periodic inspection of the drywell sand bed drains for blockage. The ASLB recommended, however, that AmerGen include this inspection among its docketed commitments. Therefore, as indicated in the Enclosure to this letter, AmerGen makes this commitment, which is now Commitment # 22 within the ASME Section XI, Subsection IWE Program.

Although not discussed in the referenced Initial Decision, the ASLB requested at the hearing that AmerGen clarify details related to its existing commitment to perform a modern three-dimensional (3D) structural analysis of the Oyster Creek drywell shell. AmerGen will confirm that the safety factors calculated by the new 3D analysis meet or exceed the safety factors specified by the ASME Code (i.e., greater than or equal to 2.0 for the refueling load case and 1.67 for the post-accident load case). As previously specified in Commitment # 18 of the IWE Program, failure to meet required limits would cause AmerGen to notify the NRC in accordance with 10 CFR Part 50. This clarification of AmerGen's IWE Program Commitment is also reflected in the Enclosure.

Also as previously stated in Commitment #18 of the IWE Program, AmerGen is including sensitivity analyses as part of its 3D structural analysis. These sensitivity analyses will use, as input, conservative thickness estimates for areas between UT thickness measurement locations, thereby producing a conservative assessment of the performance capability of the drywell shell.

After the 3D structural analysis is finalized, which will be prior to the period of extended operation, AmerGen will submit to the NRC Staff a summary of the 3D analysis. This will confirm AmerGen's completion of the 3D analysis.

Finally, in order to eliminate any confusion as to whether AmerGen will, under any circumstance, apply a strippable coating to the reactor cavity liner prior to filling it with water—an issue that was resolved in the Initial Decision—AmerGen is clarifying Commitment #2 of the ASME Section XI, Subsection IWE Program. This clarification, along with the other clarifications discussed in this letter, is shown in the Enclosure.

These clarifications will be included in the License Renewal UFSAR update.

If you have any questions, please contact Fred Polaski, Manager License Renewal, at 610-765-5935.

I declare under penalty of perjury that the foregoing is true and correct.

Respectfully,

Executed on 01-14-2008

Michael P. Gallagher
Vice President, License Renewal
AmerGen Energy Company, LLC

Enclosure: Excerpt from License Renewal Containment IWE Program Commitments

cc: Regional Administrator, USNRC Region I
USNRC Project Manager, NRR - License Renewal, Safety
Atomic Safety and Licensing Board (Copy to each Judge)
USNRC Project Manager, NRR - License Renewal, Environmental
USNRC Project Manager, NRR - Project Manager, OCGS
USNRC Senior Resident Inspector, OCGS
Bureau of Nuclear Engineering, NJDEP
File No. 05040

Enclosure – Excerpt from License Renewal Containment IWE Program Commitments

The following License Renewal Commitment List Table A.5 excerpt displays the modifications to Commitments 2 and 18, and the addition of Commitment 22 associated with the ASME Section XI, Subsection IWE Program (Item 27), as described in the above letter. **Bold** font is used to highlight new information in the table. Refer to AmerGen letter 2130-07-20464, dated February 15, 2007, for the most recent previous submittal containing the full listing of ASME Section XI Subsection IWE Program commitments.

ITEM NUMBER	COMMITMENT	UFSAR SUPPLEMENT LOCATION (LRA APP. A)	ENHANCEMENT OR IMPLEMENTATION SCHEDULE	SOURCE
27) ASME Section XI, Subsection IWE	2. A strippable coating will be applied to the reactor cavity liner to prevent water intrusion into the gap between the drywell shield wall and the drywell shell during periods when the reactor cavity is flooded.	A.1.27	**Prior to filling the reactor cavity with water**	Section B.1.27
	18. AmerGen will perform a 3-D finite element structural analysis of the primary containment drywell shell using modern methods and current drywell shell thickness data to better quantify the margin that exists above the Code required minimum for buckling. The analysis will include sensitivity studies to determine the degree to which uncertainties in the size of thinned areas affect Code margins. If the analysis determines that the drywell shell does not meet **Code-specified safety factors (i.e., 2.0 for the refueling load case and 1.67 for the post-accident load case)**, the NRC will be notified in accordance with 10 CFR 50 requirements.		Prior to the period of extended operation	
	22. Verify that the sand bed drain lines are clear from obstruction.		**Every other refueling outage**	