

Oyster Creek Generating Station



AmerGenSM

An Exelon Company

License Renewal Audit and Inspection Handbook September 20, 2005

10/3/05

OYSTER CREEK LICENSE RENEWAL

Purpose of Audit and Inspection Handbook

This Audit and Inspection Handbook contains background information and expectations for the Oyster Creek License Renewal Project team, including contractors and plant support staff, during the NRC Audits and Inspections. The handbook will be reviewed in an initial pre-job brief of the Oyster Creek License Renewal Project team members. A copy of this handbook will be provided to the NRC Audit and Inspection Team Leads.

OYSTER CREEK LICENSE RENEWAL

NRC AUDIT and INSPECTION SCHEDULE

During the review of the Oyster Creek License Renewal Application (LRA), NRC will perform a variety of tasks on the Oyster Creek site. Following is a list of their major on-site activities with an approximate schedule (Note that final on-site preparations/training will typically occur the week prior to an Audit):

<u>Date</u>	<u>Activity</u>
August 24, 2005	Public Information Meeting – License Renewal Process & Safety Review Overview. NRC Lead: Donnie Ashley
September 20-23, 2005	Scoping and Screening Audit – NRC Team Lead; Steve Tingen
October 20, 2005, 6 PM	Public Exit - Scoping and Screening Methodology
October 3-7, 2005	Aging Management Programs Audit - NRC Team Lead: Greg Cranston
October 11-12, 2005	Environmental Audit - NRC Team Lead: Michael Masnik
November 1, 2005	Public NRC Meeting - Environmental Scoping
November 7-10, 2005	AMR Audit - NRC Team Lead; Greg Cranston
December 12, 2005 (Tentative)	Public Exit Meeting – AMP / AMR Audits
March 13-17, 2006	Region Inspections – Scoping & Screening and AMP
March 27-31, 2006	NRC Team Lead: Mike Modes
TBD	Public Exit Meeting – Scoping & Screening / AMP Regional Inspections

ORGANIZATION

NRC Audit / Inspection Teams

As of 9/9/05

Project Managers

Donnie Ashley
Johnny Eads
Michael Masnik

NRR LR Safety Project Manager
NRR Communications Project Manager
NRR Environmental Project Manager

Scoping and Screening Methodology Audit

Steve Tingen

NRR Team Lead

Technical AMP and AMR Audits

Greg Cranston

NRR Team Lead

Regional Inspections

Mike Modes

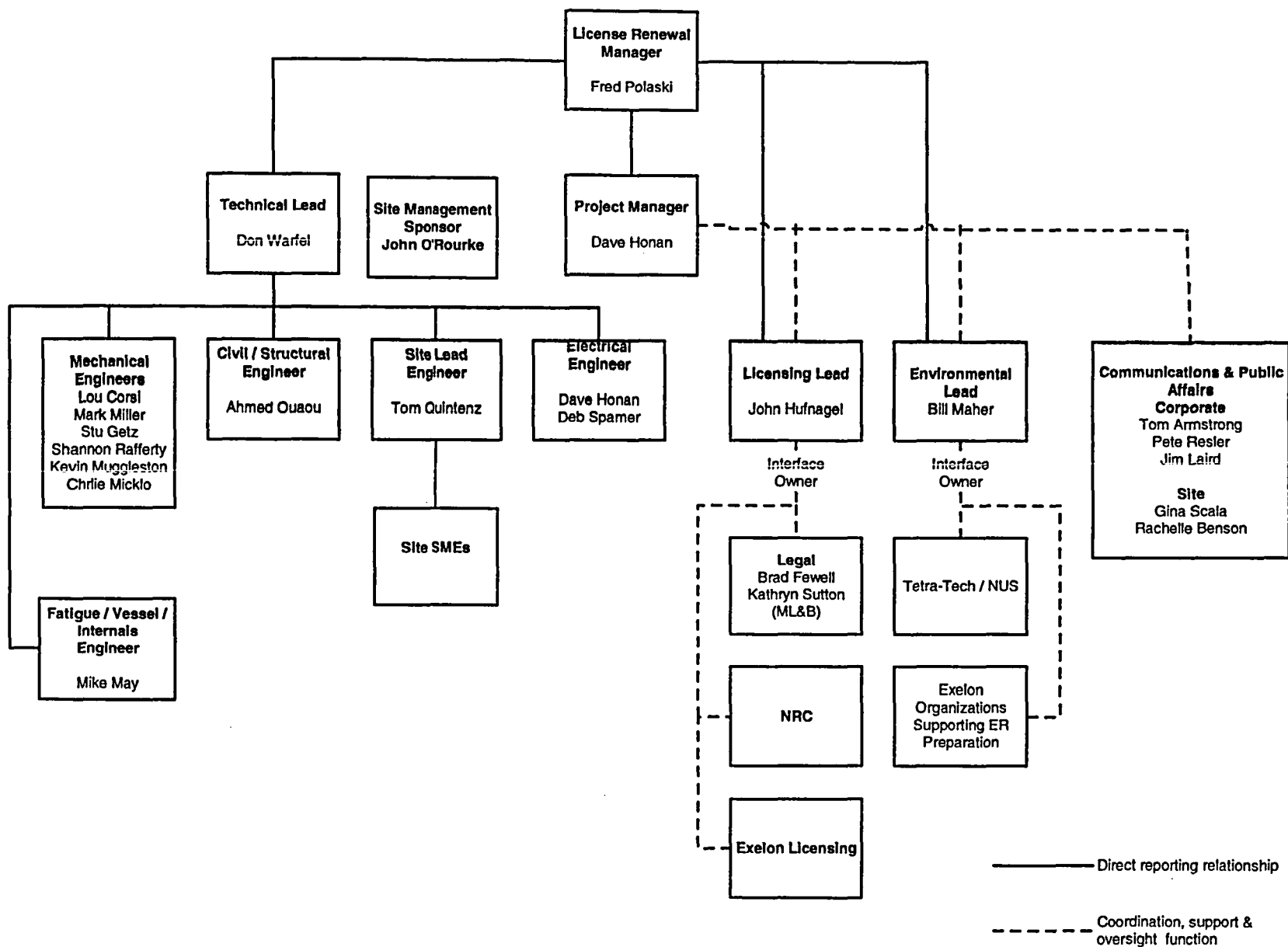
Region I Team Lead

Team Members

NRC Audit/Inspection team members and reviewers will be assigned from NRC and contractor resources. The NRC team for the Scoping and Screening Methodology audit is expected to consist of four members; their team for the AMP and AMR Audits is expected to be 8 members.

OYSTER CREEK License Renewal Project Team Organization

FOLLOWS ON NEXT PAGE



Oyster Creek License Renewal Project Organization

Revised 9/07/05

Oyster Creek LR Team Roles & Responsibilities

Oyster Creek License Renewal Manager (Fred Polaski)

- Provides Senior Management interface inside and outside of Company
- Assists LR team set strategy for dealing with issues as needed
- Participates/monitors team interactions with NRC Auditors/Inspectors

OYSTER CREEK LR Project Technical Lead (Don Warfel)

- Acts as Oyster Creek counterpart to the NRC Audit / Inspection Team Leader (Audits: or ; Inspections:
- Manages and directs the activities of the License Renewal Project Team
- Facilitates multi-disciplinary discussions among LR Project Team to resolve issues
- Conducts daily LR Project Team meetings
- Identifies issues for which commitments and Senior Management reviews are required and, as appropriate, ensure issues are entered into the Corrective Action Program
- Keeps Senior Management informed of all aspects of audit / inspection activities
- Assigns counterparts for individual auditors / inspectors and LR team individuals to respond to questions and perform peer reviews
- Obtains site concurrence on changed commitments or changes to the LRA

LR Team Manager/Mentor (Al Fulvio)

- Provides oversight for the Regulatory interface
- Reviews responses to NRC questions from an overall project technical and regulatory perspective.
- Supports Project Technical Lead as required.

LR Project Team Engineers

- Support pre-audit / inspection information request needs.
- Provide timely, clear, concise, accurate and relevant communications with NRC team members in area of responsibility.
- Document and coordinate actions to address inspection issues.
- As assigned by the LR Project Technical Lead, develop responses to questions asked by auditors/inspectors.
- Solicit additional technical support, as needed, to respond to issues and questions that are raised during the audit / inspection.
- As assigned by the LR Project Technical Lead, perform technical reviews of draft responses to questions.
- Participate in NRC communications and interviews with plant SMEs.
- Ensure problems or issues identified during the inspection are promptly addressed.
- Escalate issues/communications/concerns including response inadequacies, safety significant findings and personnel-related issues to License Renewal Manager.

- Keep the LR Technical Lead and Licensing Lead informed of subjects and outcomes of NRC team information requests and interviews.
- Communicate the potential need for new Regulatory Commitments to Technical Lead, Site Lead and Licensing Lead.

Site Lead LR Engineer (Tom Quintenz)

- Provides initial site point of contact for any site resource/personnel requirements
- Ensures site-specific information is made available to Audit/Inspection teams
- Ensures site review of responses, when appropriate
- Gains site approval for changes to or additions of Regulatory Commitments, as appropriate

NRC Interface / Licensing Lead (John Hufnagel)

- Coordinates inspection preparation activities, entrances and exit meetings
- Provides logistical support for plant access, tours, meeting rooms, work-space, and other activities of the NRC Audit / Inspection Team
- Coordinates communications with NRC License Renewal Project Manager and Audit / Inspection Team Leaders
- Coordinate review of inspection issues for potential regulatory impact or safety significance
- Escalates issues/communications/concerns including timeliness, response inadequacies, ownership for issues, safety significant findings, unclear actions
- Maintains information request, document request, and other databases to support communications.
- Provides daily reports on status of information requests

LR Environmental Lead

- Provide clear, concise and relevant communications with NRC team members in area of responsibility.
- Provide responses to questions asked by auditors/inspectors.
- Perform technical reviews of draft responses to questions.
- Solicit additional technical support, as needed, to respond to issues and questions that are raised during the audit / inspection.
- Escalate issues/communications/concerns including response inadequacies, safety significant findings and personnel-related issues to Project Management.

Plant Subject Matter Experts (SME)

- Provide clear, concise and relevant communications with NRC team members in area of responsibility.
- Support communications with NRC auditors/inspectors and others as requested by the Technical or Licensing Lead.
- Provide responses to questions asked by auditors/inspectors in a timely manner.
- Perform technical reviews of draft responses to questions, as requested.
- Solicit additional technical support, as needed, to respond to issues and questions that are raised during the audit / inspection.
- Escalate issues/communications/concerns including response inadequacies, safety significant findings and personnel-related issues to Technical Lead or designee.
- Debrief LR counterpart, LR site lead, Technical Lead and / or Licensing Lead following communications with NRC.

Administrative Assistant

- Provide logistics support to NRC and License Renewal Team as requested
- Assist LR Licensing Lead and Team members to maintain the Information Request database
- Assist all Team members to obtain copies of requested information and documents.

License Renewal Team Expectations

- Be familiar with "DO's and DON'Ts" for communicating with NRC Auditor / Inspectors.
- Review the NRC audit / inspection plan(s) associated with the audit / inspection.
- Assist in preparations for the audit / inspection.
- Develop, review and provide information requested by the NRC team.
- Manage site audit / inspection response activities and interface with NRC counterparts
- Ensure copies of License Renewal information provided to the NRC are kept by Project.
- Identify and obtain support of appropriate Subject Matter Experts (SME) as needed to interact with the NRC.
- Track issues, concerns and NRC information requests for assigned areas and prepare appropriate responses.
- Identify additional resources needed to support the audit / inspection.
- Communicate issues to the Licensing Lead, Technical Lead and SME's as appropriate.
- Initiate IRs for issues that arise, as appropriate.
- Coordinate SME interactions with the NRC and development of position papers.
- Meet daily to discuss issues, open NRC questions and actions assigned.
- Participate in daily briefing meetings with the NRC to discuss issues, the number of open questions and the quality of the interface (as requested).
- Communicate with the SME's to ascertain that issues have been reviewed and researched prior to an interaction with the NRC.
- Follow normal plant procedures if questions arise during the audit / inspection concerning operability of plant equipment or reportability of an event or condition.
- All potential safety issues along with resolution or basis for continued operation should be identified to Oyster Creek plant management.
- Communicate with Oyster Creek management as to status of issues and resource needs, as appropriate.

Do's for Communication with the NRC

Note: These reminders are intended to supplement formal plant guidance contained in LS-AA-1002, "External Organization Request Process Control," and LS-AA-1003, "NRC Inspection Preparation and Response." Please refer to those procedures. If you have additional questions, please contact your License renewal Licensing Lead.

- Be courteous, professional and business-like during communications with auditors and inspectors.
- Be proud of our plant and don't be afraid to say so. Be positive about your interactions with the NRC.
- Treat the auditors and inspectors in the same way you expect others to treat you.
- Be prepared for your interviews. Bring any drawings and reports you suspect may be useful to address the subject area.
- LISTEN carefully to the auditor or inspector's request.
- UNDERSTAND each question. Ask clarifying questions, if necessary. Don't be distracted by terminology that is different from what you are used to.
- ANSWER each question to best of your knowledge and ability, if you know the answer. Know what you are going to say before you start talking, and keep your answer focused on the question.
- Resist the urge to answer if you are unsure. It's ok to say, "I don't know." When you say "I don't know," offer to find out.
- If you know who the correct person is to answer the question, contact that person.
- If you do not know who the correct person is to answer the question, immediately inform the Technical or Licensing Lead.
- Offer to take the inspector on a tour to see an item first hand if it would be helpful.
- Keep good notes of your discussions, and provide a debrief to the Licensing Lead.
- If you are assigned to respond to a written question, prepare your written response as soon as practical. If you cannot fully respond to the question within 24 hours, or if your preliminary evaluation of the question leads you to believe the issue cannot be resolved within 24 hours, escalate the issue to the appropriate License Renewal Team member and the Licensing Lead.
- If you discover that you have provided incomplete or incorrect information, immediately notify the LR Licensing Lead.
- If the issue meets the threshold for an IR, initiate one. If the IR has a potential impact on current plant operations, discuss the issue with the Site Lead Engineer and Licensing Lead to determine the appropriate course of action and to communicate to site management. If

you initiate an IR, provide a copy of it to the Licensing Lead for capture in the appropriate file or database.

- If you have any questions concerning communications with NRC, ask the LR Licensing Lead or Technical Lead.
- Avoid surprises for the License Renewal project team, NRC and plant staffs. This means we must communicate in a coordinated way between ourselves and with the NRC.
- For plant staff SMEs, if you are being asked questions by an auditor/inspector while performing essential work activities in support of plant operations, it's okay to ask the inspector to save his/her questions until the work activity is complete.
- Reminder - it is the right of each employee to communicate concerns and issues to the NRC at all times.

Don'ts for Communication with the NRC

- Don't be confrontational or defensive.
- Don't be passive.
- Don't speculate, theorize or hypothesize.
- Don't solicit NRC opinion what answer they want to hear. The NRC inspectors are not our consultants.
- Don't fail to adequately document NRC question(s) or document request(s).
- Don't treat NRC team members as adversaries. Both of you are professionals who are attempting to do the right thing, and both of you have the same goal of protecting the health and safety of the public.
- Don't fail to provide complete information to a question or issue (e.g., provide all relevant, accurate information that you know to be a fact.)
- Don't fail to keep the NRC informed about your progress in obtaining answers to their questions.
- Don't communicate with the NRC via e-mail. This is not an appropriate form of communication during an inspection. Any License Renewal e-mails to the NRC should be from the License Renewal Licensing Lead.
- Don't grant access to safeguards, proprietary or confidential information without appropriate management approvals. Contact the LR Licensing Lead or Technical Lead if you are unsure.
- Don't make a verbal or written commitment to the NRC. Only designated senior management can make commitments, in accordance with LS-AA-110 "Commitment Management."

CONDUCT of AUDITS / INSPECTIONS

Proposed Daily Meeting Schedule

The following activities will be proposed to the NRC team lead. Exact schedules will be as agreed with the NRC leader.

<u>Time</u>	<u>Description</u>
8:00 am	First day of Audit or Inspection conduct entrance meeting with introductions and explanation of logistics.
4:00 pm	Daily Audit / inspection Feedback Meeting (NRC Team and designated License Renewal Team members)
4:30 pm	Daily Oyster Creek LICENSE RENEWAL Team meeting

OYSTER CREEK LR Project Team Facilities During NRC Visits

Both the NRC and the Exelon/AmerGen LR teams will be housed in the Training Building (Building 12). The NRC Team will work in the Team room in the Northwest corner of the building. They will also utilize the adjacent "Exam Prep" room.

The Oyster Creek LR Team will occupy the Education Center ("Ed Center") and conference room just south of the Ed Center, also in the Training Building.

The Team room and Ed Center may be used for LR Project team and NRC team meetings.

Subject Matter Experts And Program Owners

The following individuals are considered subject matter experts and will respond as requested during the inspections:

Project/Plant Program Owners

Project/Plant Program Owners				
LRA program	GALL program	Oyster Creek Aging Mgt. Program	LR Team Owner	Site Owner
B.1.01	XI.M1	ASME Section XI Inservice Inspection, Subsections IWB, IWC, and IWD	Getz	Harttraft
B.1.02	XI.M2	Water Chemistry	Rafferty	Michelle Mura (Was Michael Ford)
B.1.03	XI.M3	Reactor Head Closure Studs	May	Harttraft
B.1.04	XI.M4	BWR Vessel ID Attachment Welds	May	Harttraft
B.1.05	XI.M5	BWR Feedwater Nozzle	May	Harttraft
B.1.06	XI.M6	BWR Control Rod Drive Return Line Nozzle	Miller	Harttraft
B.1.07	XI.M7	BWR Stress Corrosion Cracking	Rafferty	Harttraft
B.1.08	XI.M8	BWR Penetrations	May	Harttraft
B.1.09	XI.M9	BWR Vessel Internals	May	Harttraft
B.1.10	XI.M13	Thermal Aging and Neutron Irradiation Embrittlement of Cast Austenitic Stainless Steel (CASS)	May	Harttraft
B.1.11	XI.M17	Flow-Accelerated Corrosion	Miller	Gayley
B.1.12	XI.M18	Bolting Integrity	Corsi	Schilling
B.1.13	XI.M20	Open-Cycle Cooling Water System	Rafferty	Gayley
B.1.14	XI.M21	Closed-Cycle Cooling Water System	Rafferty	Camire
B.1.15	XI.M22	Boraflex Rack Management Program	Ouaou	H.S. Sharma
B.1.16	XI.M23	Inspection of Overhead Heavy Load and Light Load (Related to Fuel Handling) Handling Systems	Ouaou	Gonzalez
B.1.17	XI.M24	Compressed Air Monitoring	Micklo	Trettel (Was Bill Mussel)
B.1.18	XI.M25	BWR Reactor Water Cleanup System	Miller	Harttraft
B.1.19	XI.M26	Fire Protection	Getz	Trettel
B.1.20	XI.M27	Fire Water System	Muggleston	Trettel

Project/Plant Program Owners

LRA program	GALL program	Oyster Creek Aging Mgt. Program	LR Team Owner	Site Owner
B.1.21	XI.M29	Aboveground Outdoor Tanks	Micklo	Olzsewski (Was Michelle Kichline)
B.1.22	XI.M30	Fuel Oil Chemistry	Miller	Artz
B.1.23	XI.M31	Reactor Vessel Surveillance	May	Harttraft
B.1.24	XI.M32	One-Time Inspection	Miller	Quintenz
B.1.25	XI.M33	Selective Leaching of Materials	Micklo	Camire
B.1.26	XI.M34	Buried Piping Inspection	Rafferty	Tamburro
B.1.27	XI.S1	ASME Section XI, Subsection IWE	Ouaou	Harttraft
B.1.28	XI.S3	ASME Section XI, Subsection IWF	Corsi	Harttraft
B.1.29	XI.S4	10 CFR Part 50, Appendix J	Getz	Francis
B.1.30	XI.S5	Masonry Wall Program	Ouaou	Niogi
B.1.31	XI.S6	Structures Monitoring Program	Ouaou	Niogi
B.1.32	XI.S7	RG 1.127, Inspection of Water-Control Structures Associated With Nuclear Power Plants	Ouaou	Niogi
B.1.33	XI.S8	Protective Coating Monitoring and Maintenance Program	Miller	Martinez (Was John Clark)
B.1.34	XI.E1	Electrical Cables and Connections Not Subject to Environmental Qualification Requirements	Spamer	Pruthi
B.1.35	XI.E2	Electrical Cables Not Subject to 10CFR50.49 Environmental Qualification Requirements Used in Instrumentation Circuits	Spamer	Johnson
B.1.36	XI.E3	Inaccessible Medium Voltage Cables Not Subject to 10CFR50.49 Environmental Qualification Requirements	Spamer	Pruthi
B.1.39	XI.E6	Electrical Connections (new per 2005 GALL)	Spamer	Pruthi
B.2		Plant Specific Programs		
B.2.1		Periodic Testing of Containment Spray Nozzles	Getz	Schwartz
B.2.2		Lubricating Oil Monitoring Activities	Miller	Browstow (Was Rick Conley)
B.2.3		Generator Stator Water Chemistry Activities	Corsi	Michelle Mura (Was Michael Ford)
B.2.4		Periodic Inspection of Ventilation Systems	Micklo	Yuen
B.2.5		Periodic Inspection Program	Corsi	Quintenz
B.2.6		Wooden Poles	Spamer	Skelskey
B.2.7		Periodic Monitoring of Combustion Turbine Power Plant	Muggleston	Skelskey
B.3		TLAA Evaluation of Aging Management Programs Under 10 CFR 54.21 (C) (1) (iii)		

Project/Plant Program Owners

LRA program	GALL program	Oyster Creek Aging Mgt. Program	LR Team Owner	Site Owner
B.3.1	X.M1	Metal Fatigue of Reactor Coolant Pressure Boundary	May	Harttraft
B.3.2	X.E1	Environmental Qualification (EQ) Program	May	Hertz

Plant System / Component LR Leads & Reviewers

Plant System / Component LR Leads & Reviewers			
System / Structure	LR Team Lead	Original Site Reviewer	New Site Reviewer
120 VAC Vital Power System	Kevin Muggleston	Char Desai	
120/208 Volt Non-Essential Distribution System	Kevin Muggleston	Char Desai	
125V Station DC System	Kevin Muggleston	Mike Heck	
24/48V Instrument Power DC System	Kevin Muggleston	Mike Heck	
4160V AC System	Kevin Muggleston	Mike Filippone	Joe Booty
4160V Switchgear Room Ventilation	Kevin Muggleston	John Yuen	
480/208/120V Util. (JCP&L) Non-Vital Power	Charlie Micklo	Char Desai	
480V AC System	Kevin Muggleston	Mike Filippone	
480V Switchgear Room Ventilation	Charlie Micklo	John Yuen	
Alternate Rod Injection System (ARI)	Dave Honan	Jim Frank	
Ambulance Building	Ahmed Ouaou	Sujit Niogi	
Augmented Off-Gas Closed Cooling Water System - 544	Lou Corsi	Joe Booty	
Augmented Offgas System - 231	Lou Corsi	Joe Booty	Ariadna Gutierrez
Automatic Depressurization System	Stu Getz	Sylvain Schwartz	
Battery and MG Set Room Ventilation	Kevin Muggleston	John Yuen	Jannette Gonzalez
Breathing Air Compressor Building	Ahmed Ouaou	Sujit Niogi	
Breathing Air System	Charlie Micklo	William Mussel	Tim Trettel
C Battery Room Heating & Ventilation	Kevin Muggleston	Mike Heck	
Canal Water Temperature Monitoring System	Kevin Muggleston	Everett Johnson	
Cathodic Protection System	Kevin Muggleston	Hari P. Sharma	

Chemical Laboratory Auxiliary Gasses - 858	Lou Corsi	Ariadna Gutierrez	
Chlorination Facility	Ahmed Ouaou	Sujit Niogi	
Chlorination Systems - 561	Lou Corsi	Michelle Kichline	Jannette Gonzalez
Circulating Water System	Kevin Muggleston	John Camire	
Combustion Turbine Building	Ahmed Ouaou	Sujit Niogi	
Component Supports Commodity Group	Ahmed Ouaou	Sujit Niogi	
Condensate System - 421, 423	Lou Corsi	Cliff Elliott	
Condensate Transfer building	Ahmed Ouaou	Sujit Niogi	
System / Structure	LR Team Lead	Original Site Reviewer	New Site Reviewer
Condensate Transfer System - reassigned to Charlie Micklo	Charlie Micklo	Jannette Gonzalez	
Containment Inerting System	Mark Miller	Bob Barbieri	
Containment Spray System	Shannon Rafferty	Sylvain Schwartz	
Containment Vacuum Breakers - 243	Lou Corsi	Bob Barbieri	
Control Rod Drive System	Dave Honan	Jim Frank	
Control Rods	Stu Getz	Rick Thompson	
Control Room HVAC	Charlie Micklo	John Yuen	
Core Spray System	Stu Getz	Sylvain Schwartz	
Cranes and Hoists	Ahmed Ouaou	Jannette Gonzalez	
Dilution Structure	Ahmed Ouaou	Sujit Niogi	
Dilution System	Charlie Micklo	Jannette Gonzalez	
Discharge Structure and Canal	Ahmed Ouaou	Sujit Niogi	
Drywell Cooling System	Mark Miller	Bob Barbieri	
Drywell Floor and Equipment Drains	Stu Getz	Bob Barbieri	
Electrical Heat Trace System	Kevin Muggleston	Joe Booty	
Elevators & Manlifts	Ahmed Ouaou	Jannette Gonzalez	
Emergency Diesel Generator and Auxiliary Systems	Charlie Micklo	Rick Skelskey	
Emergency Diesel Generator Building	Ahmed Ouaou	Sujit Niogi	
Emergency Service Water System	Shannon Rafferty	Sylvain Schwartz	
Exhaust Tunnel	Ahmed Ouaou	Sujit Niogi	

Feedwater System - 422, 625	Lou Corsi	Cliff Elliott	
Fire Pond Dam	Ahmed Ouaou	Sujit Niogi	
Fire Protection System (Assigned to LJC 9/10)	Kevin Muggleston	Tim Trettel	
Fire Pumphouses	Ahmed Ouaou	Sujit Niogi	
Fish Sample Pool Building	Ahmed Ouaou	Sujit Niogi	
Fuel Assemblies	Stu Getz	Rick Thompson	
Fuel Storage and Handling Equipment (Includes Fuel racks, Cask Drop Protection Sys)	Ahmed Ouaou	Rick Thompson	Hari S. Sharma (Fuel Racks); Jannette Gonzalez (Fuel Handling)
Grounding and Lightning Protection System	Kevin Muggleston	Hari P. Sharma	
Hardened Vent System	Mark Miller	Bob Barbieri	
Heat Exchanger Building	Ahmed Ouaou	Sujit Niogi	
Heating & Process Steam System	Stu Getz	Michelle Kichline	Giselle Martinez
Heating Boiler House	Ahmed Ouaou	Sujit Niogi	
Hydrogen & Oxygen Monitoring System	Mark Miller	Bob Barbieri	
Hydrogen Water Chemistry System	Mark Miller	Michelle Kichline	Giselle Martinez
Independent Spent Fuel Storage Installation	Ahmed Ouaou	Hari S. Sharma	Jim Frank
System / Structure	LR Team Lead	Original Site Reviewer	New Site Reviewer
Instrument (Control) Air System	Charlie Micklo	William Mussel	Tim Trettel
Intake Structure & Intake Canal	Ahmed Ouaou	Sujit Niogi	
Intermediate Range Monitoring System	Stu Getz	Everett Johnson	
Isolation Condenser System	Stu Getz	Sylvain Schwartz	
Lighting System	Shannon Rafferty	Everett Johnson	
Low Level Radwaste Facility	Ahmed Ouaou	Sujit Niogi	
LPRM System/APRM System	Stu Getz	Everett Johnson	
Main Condenser - 302	Lou Corsi	John Camire	
Main Condenser Air Extraction System - 331, 332	Lou Corsi	William Mussel	John Wolfrom
Main Fuel Oil Storage & Transfer System	Dave Honan	Michelle Kichline	Giselle Martinez

Main Generator and Auxiliary Systems - 711, 712, 713, 714, 715, 716, 717	Lou Corsi	Eldon Bearden	
Main Office Building HVAC	Charlie Micklo	John Yuen	
Main Steam System	Tom Quintenz	William Mussel	John Wolfrom
Main Turbine and Auxiliary Systems - 301, 303, 304, 311, 312, 313, 314, 315, 412, 413, 324, 431	Lou Corsi	Eldon Bearden	
Maintenance Building	Ahmed Ouaou	Sujit Niogi	
Materials Storage Buildings	Ahmed Ouaou	Sujit Niogi	
Meteorological Monitoring System - 662	Lou Corsi	Everett Johnson	
Miscellaneous Floor and Equipment Drain Systems	Stu Getz	Chris Lefler	
Miscellaneous HVAC Systems	Kevin Muggleston	John Yuen	
Miscellaneous Yard Structures	Ahmed Ouaou	Sujit Niogi	
Monitoring and Change Facility	Ahmed Ouaou	Sujit Niogi	
New Radwaste Building	Ahmed Ouaou	Sujit Niogi	
New Radwaste Closed Cooling Water System	Charlie Micklo	Chris Lefler	
New Radwaste Service Water System	Kevin Muggleston	Chris Lefler	
New Sample Pumphouse	Ahmed Ouaou	Sujit Niogi	
Nitrogen Supply System	Charlie Micklo	Bob Barbieri	
Noble Metals Monitoring System	Mark Miller	Ariadna Gutierrez	
Nuclear Boiler Instrumentation	Stu Getz	Everett Johnson	Joe Booty
Offgas Building	Ahmed Ouaou	Sujit Niogi	
Office Building	Ahmed Ouaou	Sujit Niogi	
Offsite Power Systems	Charlie Micklo	Rick Skelskey	
Old Radwaste Building	Ahmed Ouaou	Sujit Niogi	
Other Office Buildings	Ahmed Ouaou	Sujit Niogi	
System / Structure	LR Team Lead	Original Site Reviewer	New Site Reviewer
Penetration Pressurization System	Ahmed Ouaou	Bob Barbieri	

Pipe Tunnel	Ahmed Ouaou	Sujit Niogi	
Plant Annunciator System	Kevin Muggleston	Ariadna Gutierrez	
Plant Communications Systems	Shannon Rafferty	Ariadna Gutierrez	
Plant Computer Systems	Kevin Muggleston	Ashok Syngal	
Post-Accident Monitoring System	Charlie Micklo	Ariadna Gutierrez	
Post-Accident Sampling System	Stu Getz	Joe Booty	
Pretreatment building	Ahmed Ouaou	Sujit Niogi	
Primary Containment	Ahmed Ouaou	Bob Barbieri	
Process Sampling System	Shannon Rafferty	Michelle Kichline	Eldon Bearden
Radiation Monitoring System	Kevin Muggleston	Everett Johnson	
Radio Communication System	Dave Honan	Ariadna Gutierrez	
Radwaste Area Heating & Ventilation	Charlie Micklo	Chris Lefler	
Radwaste Systems	Charlie Micklo	Chris Lefler	
RAGEMS Building	Ahmed Ouaou	Sujit Niogi	
Reactor Building	Ahmed Ouaou	Sujit Niogi	
Reactor Building Closed Cooling Water System	Mark Miller	Bob Barbieri	
Reactor Building Floor and Equipment Drains	Stu Getz	Chris Lefler	
Reactor Building Ventilation System	Charlie Micklo	John Yuen	
Reactor Head Cooling System	Dave Honan	Jim Frank	
Reactor Internals	Mike May	Greg Harttraft	
Reactor Manual Control System	Dave Honan	Jim Frank	
Reactor Overfill Protection System	Stu Getz	Joe Booty	
Reactor Pressure Vessel	Mike May	Greg Harttraft	
Reactor Protection System	Kevin Muggleston	Joe Booty	
Reactor Recirculation System	Stu Getz	Bob Barbieri	
Reactor Water Cleanup System	Mark Miller	Ariadna Gutierrez	
Remote Shutdown System (electrical: no (a)(2) or screening)	Kevin Muggleston	Rick Skelskey	
Respirator Facility	Ahmed Ouaou	Sujit Niogi	
Rod Worth Minimizer	Dave Honan	Jim Frank	
Roof Drains and Overboard Discharge	Mark Miller	Chris Lefler	
Sanitary Waste System - 581/872	Lou Corsi	Chris Lefler	
Screen Wash System	Charlie Micklo	John Camire	

Security Structures	Ahmed Ouaou	Sujit Niogi	
Service Air System	Charlie Micklo	William Mussel	Tim Trettel
Service Water System	Mark Miller	John Camire	
Shutdown Cooling System	Stu Getz	Sylvain Schwartz	
Site Emergency Building	Ahmed Ouaou	Sujit Niogi	
System / Structure	LR Team Lead	Original Site Reviewer	New Site Reviewer
Source Range Monitoring System	Mike May	Everett Johnson	
Spent Fuel Pool Cooling Systems - 251, 255	Lou Corsi	Bob Barbieri	
Standby Gas Treatment System	Charlie Micklo	John Yuen	
Standby Liquid Control System (Liquid Poison System)	Mark Miller	Ariadna Gutierrez	
Station Blackout System	Charlie Micklo	Rick Skelskey	
Torus Water Storage & Transfer System - 243	Lou Corsi	Bob Barbieri	
Traveling In-Core Probe System	Stu Getz	Everett Johnson	
Turbine Building	Ahmed Ouaou	Sujit Niogi	
Turbine Building Closed Cooling Water System	Mark Miller	John Camire	
Turbine Building Ventilation System	Charlie Micklo	John Yuen	
Ventilation Stack	Ahmed Ouaou	Sujit Niogi	
Water Treatment & Distr. Systems	Shannon Rafferty	William Mussel	John Wolfrom
Zinc Injection System	Mark Miller	Michelle Kichline	Giselle Martinez

INFORMATION MANAGEMENT

The LR Project Team will maintain a database of NRC Information Requests and their responses. Specific familiarization on the system will be provided to the License Renewal team. Requests may be entered directly, or they may be hand written and provided to the Administrative Assistant or Licensing Lead.

A copy of an Information Request form that can be used by an NRC inspector or License Renewal team member is provided on the next page. Each completed form should be given promptly to the Administrative assistant or Licensing Lead for data entry.

The database itself should be used in lieu of this form when questions are provided electronically or if time permits. Any member of the License Renewal team may enter questions and responses. Before a response is give to the NRC requestor, the response shall be independently reviewed by an assigned peer and approved by the LR Technical Lead. The actual response provided to the requestor should normally be printed out of the database using the report capability provided.

NRC INFORMATION REQUEST FORM

Item Number: _____ Date Initiated: _____

Date Initiated: _____

Topic: _____

Document References: _____

NRC Representative: _____

AmerGen Representative: _____

Request:

Assigned to: _____

Response:

LRCR: _____

Additional Action (e.g., IR#): _____

Approvals:

Prepared by/Date: _____

Reviewed by/Date: _____

Approved by/Date: _____

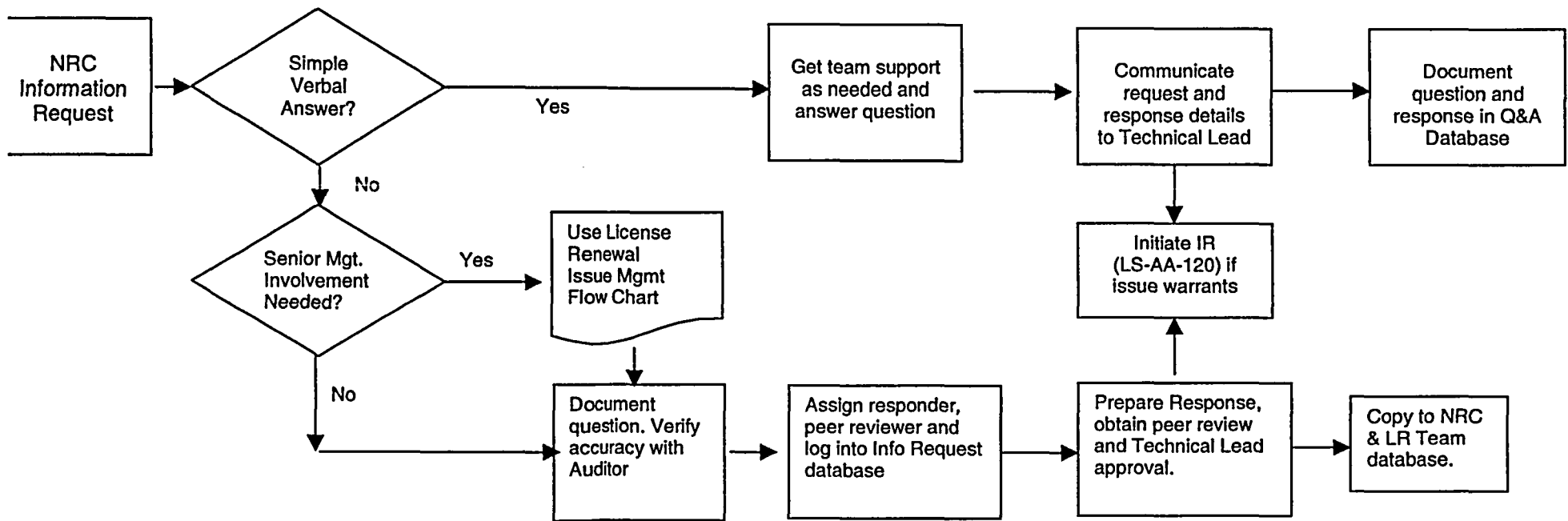
NRC Acceptance (Date): _____

Inspection Communications Channels

The following is a communications hierarchy for the License Renewal audit / inspections. By following this hierarchy we will ensure consistent communications and that the appropriate levels of NRC and License Renewal management are informed of responses to questions raised by the audit / inspection teams. This hierarchy will also enhance our ability to escalate and resolve issues with the NRC.

NRC Contact	AmerGen/OC Counterpart	Frequency of Contact
NRR Director License Renewal - PT Kuo	Fred Polaski	As needed for issue resolution
NRR License Renewal Safety PM - Donnie Ashley	Fred Polaski and John Hufnagel	Daily or weekly to ensure adequate progress and resolution of issues
NRR License Renewal Environmental PM (Michael Masnik)	Bill Maher	Daily or weekly to ensure adequate progress and resolution of issues
Audit and/or Inspection Team Lead Scoping/Screening Methodology - Steve Tingen AMP/AMR - Greg Cranston Regional Inspections - Michael Modes	Don Warfel and John Hufnagel	Frequent daily contact during Audits to ensure progress and resolution of issues
NRC inspection / Audit team member	LR Team members, as assigned by LR Technical Lead and System Mgrs and Program Owners	As needed during course of audit / inspection
NRR Part 50 PM - Peter Tam	Dave Helker and Jhansi Kandasamy	As Needed

Oyster Creek Audit / Inspection Information Request Flow Chart



Updated 9/14/05

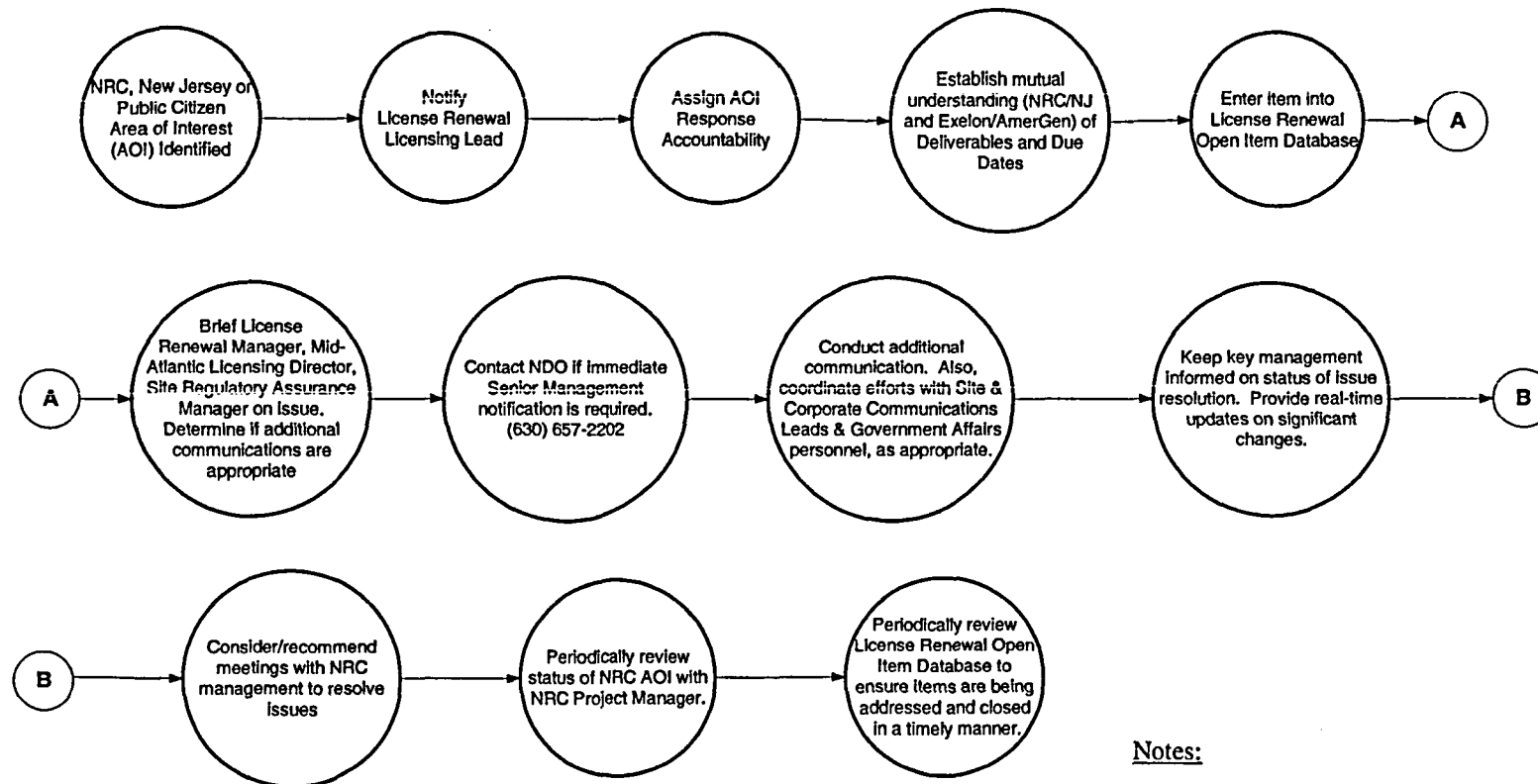
Routine External Communications – License Renewal Project (Based on LS-AA-1030)

Updated 9/21/05

Executive/Manager	Agency Personnel	Frequency	Licensing/Regulatory Assurance Support	Communications Objective	Meeting Arranger
Senior Vice President, Mid-Atlantic Operations	Director, NRR (Jim Dyer)	Quarterly (Timing – soon after monthly project update)	Vice President, Licensing & Regulatory Affairs or Mid Atlantic Licensing Director, if needed	Discuss overall project status; any major issues	Joan Bruning
Corporate Vice President, Licensing & Regulatory Affairs	Director, Division of License Renewal (Frank Gillespie)	Quarterly	Mid Atlantic Licensing Director	Review any Regulatory or Political Issues, Concerns	Helen Tiberghien
Site Vice President, Oyster Creek Generating Station	Deputy Director, Division of License Renewal (P.T. Kuo)	Monthly	MA Licensing Director or Exelon License Renewal Licensing Lead, as needed	Demonstrate engagement with License Renewal process	Marita Zaremba
Director, Mid-Atlantic Licensing, Exelon Manager, License Renewal and Exelon LR Licensing Lead, as needed	Branch Chief, License Renewal (Sam Lee/Louise Lund)	Monthly	Exelon License Renewal Licensing Lead	Review project progress and effectiveness of Licensee – NRC communications	Karen Simpson
Exelon License Renewal Licensing Lead	License Renewal Project Manager (Donnie Ashley)	Daily (Phone); Monthly (Face-to-Face)	N/A	Routine project business; identify, anticipate and resolve project issues	Karen Simpson
Exelon LR Manager and Licensing Lead; Exelon Environmental Lead; Oyster Creek Reg. Assurance Manager	NJDEP/BNE Jill Lipoti Kent Tosch	Monthly	N/A	Identify/address issues of concern with the State	John Hufnagel

Note: Exelon/AmerGen has established a lead individual who is responsible to be involved with and to manage all External communications (the LR project Licensing Lead, John Hufnagel). He must be kept informed of all regulatory interactions associated with License Renewal.

License Renewal - Issues Management Flowchart (9/29/05)



Notes:

1. This process is consistent with Exelon Procedure LS-AA-1004, NRC Case Management Guideline.
2. Separate processes as defined in the License Renewal Handbook are used for RAIs or Audit Questions.
3. The License Renewal licensing lead is responsible to see that the above actions are performed.

Glossary of Terms

License Renewal Inspection / Audit Terms

Audit - License Renewal: A review of documentation and underlying references to determine the accuracy of submitted material in order to reach a reasonable assurance that identified aging will be adequately managed during the period of extended operation. NRC headquarters personnel or their contractors normally conduct this effort.

Inspection – License Renewal: A review of documentation and underlying references to determine the accuracy of submitted material in order to reach a reasonable assurance that identified aging will be adequately managed during the period of extended operation. Inspections are normally focused on the in-plant implementation of LR processes and programs to identify affected passive equipment and manage aging. NRC regional personnel or their contractors normally conduct this effort.

Information Request: A question asked of the Oyster Creek organization to clarify information provided in the License Renewal Application. These can be received in verbal, draft or final written form. Responses are provided directly to the NRC team member in verbal or written form. Information requests and responses will be tracked by the License Renewal staff in a database.

Request For Additional Information (RAI): Written question provided by NRC in a formal, docketed letter. An RAI requires a formal written response in a docketed letter. AmerGen letters responding to RAIs will be submitted to NRC under oath or affirmation. These letters actually modify the License Renewal Application.

License Renewal Process Terms

Scoping and Screening: A License Renewal process for selecting those systems, structures and components that meet 10 CFR 54 for being in-scope and subject to and Aging Management Review.

Aging Management Review (AMR): A system, structure of component specific technical evaluation of materials, and environments that identifies potential aging effects and an appropriate aging management program for managing the identified aging effect.

Aging Management Program (AMP): A program designed to manage identified aging effects in in-scope systems, structures and components

Aging Management Program Document: A detailed formal description of an aging program structured to detail how the program meets 10 generic or program specific elements described in NRC License Renewal guidance documents.

Integrated Plant Assessment (IPA): A process that incorporates the Scoping and Screening and AMR process for Oyster Creek