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**To:** <dja1@nrc.gov>, <rkm@nrc.gov>  
**Date:** 03/31/2006 12:04:19 PM  
**Subject:** Responses to three more AMP questions

Donnie & Roy,

The attached three Responses (to questions AMP-359, AMP-360 and AMP-362) are provided for your review. These three were included in the 3/17/06 e-mail from Donnie Ashley to George Beck. It was agreed they would be addressed in the Q & A database since they originate from the Audit.

Note that we are busy finalizing responses to the last seven database questions, related to the drywell, and expect to get those to you early next week to facilitate completion of your review and Audit report. If you have any questions, please contact me. Thanks.

- John.

<<Q & A Database Response AMP-362.pdf>> <<Q & A Database Response AMP-360.pdf>> <<Q & A Database Response AMP-359.pdf>>

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**CC:** <donald.warfel@exeloncorp.com>, <George.Beck@exeloncorp.com>, <fred.polaski@exeloncorp.com>

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Files	Size	Date & Time
MESSAGE	1591	31 March, 2006 12:03:48 PM
TEXT.htm	2434	
Q & A Database Response AMP-362.pdf		61063
Q & A Database Response AMP-360.pdf		58797
Q & A Database Response AMP-359.pdf		61821
Mime.822	256074	

**Options**

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**Concealed Subject:** No  
**Security:** Standard

## ***NRC Information Request Form***

***Item No***  
AMP-359

***Date Received:*** 3/16/2006      ***Source*** AMP Audit

***Topic:***  
Lubricating Oil Analysis Program - FRCT (AMP B.1.39)

***Status:*** Open

***Document References:***

***NRC Representative*** Davis, Jim

***AmerGen (Took Issue):*** Beck, Chip

### **Question**

This question was received from Donnie Ashley, NRC Project Manager on 3/14/06 as a draft RAI. On 3/16/06 it was agreed that it would be addressed in the Q&A database since it originates from the audit (Roy Matthew). Subsequently included in 3/17/06 email from Donnie Ashley to George Beck

The Lubricating Oil Analysis Program - FRCT (OCGS AMP B.1.39) takes exception to the GALL Report requirement to monitor flash point.

The basis provided for exceptions to GALL, Element 3 (Parameters Monitored or Inspected) is not valid since the Flash Point of an industrial lubricant is an important test to determine if light-end hydrocarbons are getting into the oil through seal leaks or other means. It is an effective way to monitor seal performance in light end hydro-carbon compressors. Low Flash Points pose a safety hazard in the event of component failure that can generate heat above the flash point of the oil, such as bearing failure.

Please justify the reason for not monitoring the flash point of lubricating oil at the FRCT and why this exception is acceptable to manage the effects of aging for which it is credited.

***Assigned To:*** Beck, Chip

### **Response:**

The Lubricating Oil Analysis Program - FRCT (PBD-AMP-1.39) will be revised to include measurement of flash point.

(This is consistent with PBD-AMP-B.2.02 Lubricating Oil Monitoring Activities)

***LRCR #:*** 292                      ***LRA A.5 Commitment #:***

***IR#:***

**Approvals:**

## ***NRC Information Request Form***

***Prepared By:*** Beck, Chip 3/30/2006

***Reviewed By:*** Muggleston, Kevin 3/30/2006

***Approved By:*** Warfel, Don 3/30/2006

***NRC Acceptance (Date):***

## ***NRC Information Request Form***

**Item No**  
AMP-360

**Date Received:**  
3/17/2006

**Source**

**Topic:**  
PBD-AMP-B.2.2 Lubricating Oil Monitoring Activities

**Status:** Open

**Document References:**

**NRC Representative** Davis, Jim

**AmerGen (Took Issue):** Beck, Chip

### **Question**

This question was received in an email from Donnie Ashley, NRC Project Manager, to George Beck, dated 3/17/06.

PBD-AMP-B.2.2, "Lubricating Oil Monitoring Activities," Element 3 states that oil analysis guidelines will be enhanced to include measurement of flash point for diesel engine lubricating oil. This is a new enhancement based on the reconciliation of this aging management program from the draft January 2005 NUREG-1800, Rev. 1 to the approved September 2005 NUREG-1801, Rev. 1. This enhancement is not identified in OCGS LRA B.2.2. Is the LRA supplemented to reflect this?

**Assigned To:** Beck, Chip

### **Response:**

This enhancement is addressed in the "Summary of Reconciliation of OC LRA to September 2005 Revision 1 NUREG-1800 and NUREG-1801" transmitted to the NRC on March 30, 2006 (Letter No. 2130-06-20293). This is an addition to the LRA Table A.5 License Renewal Commitment List Item No. 38.

**LRCR #:** **LRA A.5 Commitment #:** 38

**IR#:**

### **Approvals:**

**Prepared By:** Beck, Chip 3/30/2006

**Reviewed By:** Getz, Stu 3/30/2006

**Approved By:** Warfel, Don 3/30/2006

**NRC Acceptance (Date):**

## ***NRC Information Request Form***

***Item No***  
AMP-362

***Date Received:*** 3/17/2006  
***Source*** AMP Audit

***Topic:***  
PBD-AMP-B.1.21 Aboveground Outdoor Tanks

***Status:*** Open

***Document References:***

***NRC Representative*** Davis, Jim

***AmerGen (Took Issue):*** Beck, Chip

**Question**

This question was received in an email from Donnie Ashley, NRC Project Manager, to George Beck, dated 3/17/06.

PBD -AMP- B.1.21, "Aboveground Outdoor Tanks," identifies an exception to NUREG-1801 for element 5 (The program utilizes tank inspections every 5 years in place of system walkdowns each outage). This exception is not identified in OCGS LRA B1.12. Is the LRA supplemented to reflect this? What is the basis for this exception? why this exception is acceptable to manage the effects of aging for which it is credited.

***Assigned To:*** Micklo, Charles

**Response:**

The technical justification for the exception to NUREG-1801 is provided in the response to Item No. AMP-148. LRCR 231 was written to correct Exelon's documentation. The exception identified does not change any commitment stated in LRA Appendix A. The exception is included in the Question and Answer database, item AMP-148 and in the PBD-AMP-B.1.21 document that have been provided to the NRC. An LRA supplement is not required.

***LRCR #:*** 231                      ***LRA A.5 Commitment #:***

***IR#:*** 376714.04.05

**Approvals:**

***Prepared By:*** Micklo, Charles                      3/30/2006

***Reviewed By:*** Muggleston, Kevin                      3/30/2006

***Approved By:*** Warfel, Don                      3/30/6006

***NRC Acceptance (Date):***