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Exelon Nuclear

NEI 99-04

RA-11-031

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U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

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

Subject: Commitment Change Summary Report – 2010

Enclosed is the Oyster Creek Nuclear Generating Station Commitment Change Summary Report for regulatory commitments changed during the calendar year 2010. The content and format of the information submitted in this report is in accordance with the guidance provided by NEI 99-04.

Please contact James Kerr at (609) 971-4557 if any further information or assistance is needed.

Sincerely,

Michael J. Massaro

Michael J. Massaro
Vice President
Oyster Creek Nuclear Generating Station

Enclosure

cc: Administrator, USNRC Region I
G. Edward Miller, USNRC Senior Project Manager, Oyster Creek
J. Kulp, USNRC Senior Resident Inspector, Oyster Creek

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Oyster Creek Nuclear Generating Station
2010 Commitment Change Summary Report

The following NRC commitment tracked in the Oyster Creek Nuclear Generating Station (OCNGS) commitment-tracking database was changed during the calendar year 2010. These changes were evaluated in accordance with Exelon Procedure LS-AA-110, *Commitment Management*, and determined to require NRC notification in this Commitment Change Summary Report, consistent with NEI 99-04 guidance.

10-001: Boraflex Coupon Sampling

Original Commitment and Revised Commitment – The existing Boraflex monitoring program is credited for monitoring aging mechanisms. The revised commitment maintains the existing Boraflex monitoring program but does not include coupon sampling.

Justification – The intent of the existing commitment is to ensure that aging related mechanisms will not affect the ability of the Oyster Creek Spent Fuel Pool Boraflex panels to perform their function of maintaining adequate shutdown margin. The committed program ensures that the design of the Oyster Creek Poison Fuel Racks (Boraflex Racks) employs a neutron absorbing material between stored fuel assemblies to assure that the neutron multiplication factor remains below 0.95. This is accomplished by distributing irradiated fuel so as to limit the peak Boron loss to less than 10% thinning (4 mil) of the panel thickness beyond which the current criticality analysis will have to be reanalyzed. The Boraflex Rack Management Program is an existing program that provides for aging management of the Boraflex neutron poison material. The program consists of monitoring the condition of Boraflex by routinely sampling fuel pool silica levels, periodically trending the condition of Boraflex using RACKLIFE, and periodically performing in-situ measurement of boron-10 areal density using the BADGER device. The BADGER device test is conducted every 3 years.

A Boraflex monitoring program for the actual Boraflex panels is implemented in the spent fuel racks to assure that no unexpected degradation of the Boraflex material would compromise the criticality analysis in support of the design of spent fuel storage racks. The applicable aging management program (AMP), based on manufacturer's recommendations, relies on periodic inspection, testing, monitoring, and analysis of the criticality design to assure that the required 5% subcriticality margin is maintained. The frequency of the inspection and testing depends on the condition of the Boraflex, with a maximum of five years. Certain accelerated samples are tested every two years. Results based on test coupons have been found to be unreliable in determining the degree to which the actual Boraflex panels have been degraded. Therefore, this AMP includes:

(1) Performing neutron attenuation testing, called blackness testing, to determine gap formation in Boraflex panels;

(2) Completing sampling and analysis for silica levels in the spent fuel pool water and trending the results by using the EPRI RACKLIFE predictive code or its equivalent on a monthly, quarterly, or annual basis (depending on Boraflex panel condition); and

(3) measuring boron areal density by techniques such as the BADGER device. Corrective actions are initiated if the test results find that the 5% subcriticality margin cannot be maintained because of current or projected future Boraflex degradation.