

## NRR-PMDAPEm Resource

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**From:** Gladney, Robert  
**Sent:** Thursday, August 14, 2014 10:54 AM  
**To:** david.helker@exeloncorp.com; Richard.Gropp@exeloncorp.com  
**Cc:** Lamb, John; Bedi, Gurjendra; Alley, David; Caponiti, Kathleen; Schaaf, Robert  
**Subject:** Oyster Creek Snubber LAR RAI  
**Attachments:** Oyster Creek RAIs for TS Change for Snubber Relocation (MF4124) 2014-08-....doc

Dear David Helker and Richard Gropp,

By letter dated April 30, 2014 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML14127A435), Exelon Generating Company, LLC (Exelon, EGC, or the licensee) submitted a license amendment request (LAR) to the U.S. Nuclear Regulatory Commission (NRC) for Oyster Creek Nuclear Generating Station. The proposed amendment would revise the Technical Specification (TS) requirements for snubbers to conform to planned revisions to the inservice inspection (ISI) program.

Attached, for your review, is a **DRAFT** request for additional information (RAI) regarding this licensing action. Please review to ensure that the questions are understandable, the regulatory basis is clear, there is no proprietary information contained in the draft RAI, and to determine if the information was previously docketed. Also, please let me know if Exelon would like a clarifying conference call and how much time Exelon needs to respond to the RAI.

Thanks,

***Robert L. Gladney***  
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NRC/NRR/DORL/LPLI-2  
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**Sent Date:** 8/14/2014 10:54:17 AM  
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**From:** Gladney, Robert

**Created By:** Robert.Gladney@nrc.gov

**Recipients:**

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**Post Office:**

Files	Size	Date & Time
MESSAGE	1216	8/14/2014 10:54:00 AM
Oyster Creek RAls for TS Change for Snubber Relocation (MF4124) 2014-08-....doc		
40510		

**Options**

**Priority:** Standard  
**Return Notification:** No  
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REQUEST FOR ADDITIONAL INFORMATION  
REGARDING PROPOSED LICENSE AMENDMENT REQUEST  
CHANGES TO SNUBBER SURVEILLANCE REQUIREMENTS  
EXELON GENERATING COMPANY, LLC (EGC)  
OSTER CREEK NUCLEAR GENERATING STATION  
DOCKET NO. 50-219  
(TAC No. MF4124)

By letter dated April 30, 2014 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML14127A435), Exelon Generating Company, LLC (EGC or the licensee) submitted a license amendment request (LAR) for Oyster Creek Nuclear Generating Station. The proposed amendment would revise the Technical Specification (TS) requirements for snubbers to conform to planned revisions to the inservice inspection (ISI) program.

The Nuclear Regulatory Commission (NRC) staff has reviewed the information the licensee provided that supports the proposed LAR and have the following request for additional information (RAI).

**RAI 1**

Attachment 2, "Markup of Technical Specification Pages," the licensee deleted all the information related to Snubber Inspection Program, in Technical Specification (TS) 4.5.M Surveillance Requirements (SR) and added the Administrative Controls of "Snubber Inspection Program," under TS 4.5.M.1. The added details are from Insert 1 on TS Page 4.5-6 (details of Insert I is as specified on TS Page 4.5-18). Please specify and explain the reason to include Administrative Controls of "Snubber Inspection Program," in the TS 4.5.M instead of including it in TS Administrative Controls Section of TS 6.8. Alternatively, revise the markup to include the Administrative Controls of "Snubber Inspection Program in TS Administrative Controls Section of TS 6.8.

**RAI 2**

Attachment 2, "Markup of Technical Specification Pages," the licensee deleted all the information related to Snubber Inspection Program, in Technical Specification (TS) 4.5.M Surveillance Requirements. The first paragraph of TS 4.5.M.1. f, states that "A record of the service life of each snubber, the date of which the designated service life commence and installation and maintenance records on which the designated service life is based shall be maintained as required by Specification 6.10.2.I." Given the continued presence of specification 6.10.2.I, it is not clear to the NRC staff it is possible to remove the deleted material from this TS. Please justify the removal of this material or reinstate it.

Enclosure

**RAI 3**

Attachment 5, "Snubber Administrative Program Document," Section 3.0, "Snubber Plan, " states that in part that Procedure ER-AA-330-004 implements "Visual Examination of Snubbers," whereas in Section 3.3.1 states that the visual examination of all snubbers included in the program shall be performed in accordance with procedures ER-AA-330-004 and ER-AA-335-016. Please explain the difference between procedures ER-AA-330-004 and ER-AA-335-016.

**RAI 4**

Attachment 2, "Markup of Technical Specification Pages," Insert 1 on page 4.5-18, Item d, states that "120-month program updates shall be made in accordance with 10 CFR 50.55a (including 10 CFR 50.55a(b)(3)(v)) subject to limitation and modifications listed therein. In the current 10 CFR 50.55a, the wordings "limitation and modifications," has been changed to "Conditions". Therefore, please revise the TS markup accordingly.