



Order No. EA-12-049

RS-15-213
RA-15-065

August 28, 2015

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: Fifth Six-Month Status Report in Response to March 12, 2012 Commission Order
Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-
Design-Basis External Events (Order Number EA-12-049)

References:

1. NRC Order Number EA-12-049, "Issuance of Order to Modify Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," dated March 12, 2012
2. NRC Interim Staff Guidance JLD-ISG-2012-01, "Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," Revision 0, dated August 29, 2012
3. NEI 12-06, "Diverse and Flexible Coping Strategies (FLEX) Implementation Guide," Revision 0, dated August 2012
4. Exelon Generation Company, LLC's Initial Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated October 25, 2012
5. Exelon Generation Company, LLC Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated February 28, 2013 (RS-13-023)
6. Exelon Generation Company, LLC First Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated August 28, 2013 (RS-13-125)
7. Exelon Generation Company, LLC Second Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated February 28, 2014 (RS-14-013)
8. Exelon Generation Company, LLC Third Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated August 28, 2014 (RS-14-211)

9. Exelon Generation Company, LLC Fourth Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated February 27, 2015 (RS-15-022)
10. NRC letter to Exelon Generation Company, LLC, Oyster Creek Nuclear Generating Station – Interim Staff Evaluation Relating to Overall Integrated Plan in Response to Order EA-12-049 (Mitigation Strategies) (TAC No. MF0824), dated February 19, 2014

On March 12, 2012, the Nuclear Regulatory Commission (“NRC” or “Commission”) issued an order (Reference 1) to Exelon Generation Company, LLC (EGC). Reference 1 was immediately effective and directs EGC to develop, implement, and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event. Specific requirements are outlined in Attachment 2 of Reference 1.

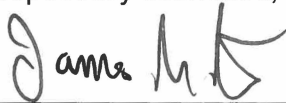
Reference 1 required submission of an initial status report 60 days following issuance of the final interim staff guidance (Reference 2) and an overall integrated plan pursuant to Section IV, Condition C. Reference 2 endorses industry guidance document NEI 12-06, Revision 0 (Reference 3) with clarifications and exceptions identified in Reference 2. Reference 4 provided the EGC initial status report regarding mitigation strategies. Reference 5 provided the Oyster Creek Nuclear Generating Station overall integrated plan.

Reference 1 requires submission of a status report at six-month intervals following submittal of the overall integrated plan. Reference 3 provides direction regarding the content of the status reports. References 6, 7, 8, and 9 provided the first, second, third, and fourth six-month status reports, respectively, pursuant to Section IV, Condition C.2, of Reference 1 for Oyster Creek Nuclear Generating Station. The purpose of this letter is to provide the fifth six-month status report pursuant to Section IV, Condition C.2, of Reference 1, that delineates progress made in implementing the requirements of Reference 1. The enclosed report provides an update of milestone accomplishments since the last status report, including any changes to the compliance method, schedule, or need for relief and the basis, if any. The enclosed report also addresses the NRC Interim Staff Evaluation Open and Confirmatory Items contained in Reference 10.

This letter contains no new regulatory commitments. If you have any questions regarding this report, please contact David P. Helker at 610-765-5525.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 28th day of August 2015.

Respectfully submitted,



James Barstow
Director - Licensing & Regulatory Affairs
Exelon Generation Company, LLC

Enclosure:

1. Oyster Creek Nuclear Generating Station Fifth Six-Month Status Report for the Implementation of Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events

cc: Director, Office of Nuclear Reactor Regulation
NRC Regional Administrator - Region I
NRC Senior Resident Inspector – Oyster Creek Nuclear Generating Station
NRC Project Manager, NRR – Oyster Creek Nuclear Generating Station
Ms. Jessica A. Kratchman, NRR/JLD/PMB, NRC
Mr. Jack R. Davis, NRR/DPR/MSD, NRC
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Mr. Jeremy S. Bowen, NRR/DPR/MSD/MSPB, NRC
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Mr. John D. Hughey, NRR/JLD/JOMB, NRC
Manager, Bureau of Nuclear Engineering – New Jersey Department of Environmental Protection
Mayor of Lacey Township, Forked River, NJ

Enclosure

Oyster Creek Nuclear Generating Station

**Fifth Six-Month Status Report for the Implementation of Order EA-12-049, Order
Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-
Design-Basis External Events**

(10 pages)

Oyster Creek Nuclear Generating Station Fifth Six Month Status Report for the Implementation of FLEX
August 2015

Enclosure

Oyster Creek Nuclear Generating Fifth Six Month Status Report for the Implementation of Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events

1. Introduction

Oyster Creek Nuclear Generating Station developed an Overall Integrated Plan (Reference 1), documenting the diverse and flexible strategies (FLEX), in response to NRC Order Number EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Reference 2). This enclosure provides an update of milestone accomplishments since submittal of the last status report including any changes to the compliance method, schedule, or need for relief / relaxation and the basis, if any.

2. Milestone Accomplishments

None

3. Milestone Schedule Status

The following provides an update to Attachment 2 of the Overall Integrated Plan. It provides the activity status of each item, and whether the expected completion date has changed. The dates are planning dates subject to change as design and implementation details are developed.

The revised milestone target completion dates do not impact the order implementation date.

Milestone Schedule

Activity	Target Completion Date	Activity Status	Revised Target Completion Date
Submit 60 Day Status Report	October 2012	Complete	
Submit Overall Integrated Plan	February 2013	Complete	
Contract with RRC		Complete	
Submit 6 Month Updates:			
Update 1	August 2013	Complete	
Update 2	February 2014	Complete	
Update 3	August 2014	Complete	
Update 4	February 2015	Complete	
Update 5	August 2015	Complete with this submittal	
Update 6	February 2016	Not Started	
Update 7	August 2016	Not Started	
Submit Completion Report	October 2016	Not Started	

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Activity	Target Completion Date	Activity Status	Revised Target Completion Date
Modification Development			
Modification Development (All FLEX Phases)	August 2016	Started	Revised in August 2013 update
Modification Implementation (All FLEX Phases)	October 2016	Not Started	No Change
Procedures:			
Create Site-Specific Procedures	October 2016	Started	No Change
Validate Procedures (NEI 12-06, Sect. 11.4.3)	October 2016	Not Started	No Change
Create Maintenance Procedures	October 2016	Started	No Change
Perform Staffing Analysis	June 2016	Not Started	No Change
Storage Plan and Construction	October 2016	Started	No Change
FLEX Equipment Acquisition	October 2016	Started	No Change
Training Completion	October 2016	Not Started	No Change
National SAFER Response Center	December 2015	Started	Revised in August 2014 update
Full Site FLEX Implementation	October 2016	Started	No Change

4. Changes to Compliance Method

Change 1:

General Integrated Plan Elements BWR - Provide a sequence of events and identify any time constraint required for success including the technical basis for the time constraint. – Item 3; Control Room crew has assessed SBO and plant conditions and declares an Extended Loss of AC Power (ELAP) event.

Reason for Change:

- A review of the timeline and procedure actions has determined the declaration of an ELAP event does not have to occur until 60 minutes into the event. Actions from the SBO procedure will be sufficient to guide the crew actions and deployment of equipment.

Change 2:

General Integrated Plan Elements BWR - Provide a sequence of events and identify any time constraint required for success including the technical basis for the time constraint. – Items 8 and 15; Continue to maintain critical functions of core cooling (via IC and FLEX Pump injection), containment (via Isolation Condensers) and SFP cooling (FLEX pump injection to SFP).

Reason for Change:

- The MAAP analysis (Reference 7) used to predict the peak containment parameters and establish the timing for possible containment venting has been revised. The revised MAAP does not indicate the need for containment venting. Revision 1 adds one (1) additional MAAP case that alters the time of external RPV injection and adjusts isolation condenser operation strategy to prevent collapsed water level in the RPV shroud from dropping below TAF.
 - An assumption in the MAAP is the containment vent is opened when RPV level reaches TAF or to stay below the 35 psig containment design pressure as specified in each scenario. Each scenario was reviewed and Cases 5 through 7 require no containment venting. Case 7 will be used to establish the timeline for this event.

Change 3:

General Integrated Plan Elements BWR - Provide a sequence of events and identify any time constraint required for success including the technical basis for the time constraint. – Item 12; Commence injecting into the reactor using the FLEX pump and restore level to the normal band.

Reason for Change:

- The MAAP analysis (Reference 7) used to predict the peak containment parameters and establish the timing for possible containment venting has been revised. The revised MAAP does not indicate the need for containment venting. Revision 1 adds one (1) additional MAAP case that alters the time of external RPV injection and adjusts isolation condenser operation strategy to prevent collapsed water level in the RPV shroud from dropping below TAF.
 - An assumption in the MAAP analysis (Reference 7, Case 7) is the FLEX pump injection into the RPV is at 3.3 hours (100 gpm at 160 psig). Prior Case 6 resulted in the collapsed water level in the RPV shroud dropping below TAF for a short period of time. This was the result of RPV water inventory contraction due to the simultaneous operation of both ICs at t=3.8 hours. Case 7 provides a strategy that prevents collapsed shroud level from dropping below TAF by initiating external RPV injection earlier (3.3. hours versus 3.8 hours for Case 6)

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and delay of simultaneous IC operation until the normal RPV water level recovers sometime after 3.3 hours.

Change 4:

The following changes were made to the Overall Integrated Plan (OIP) conceptual drawings submitted in the Second Six-Month Status Report (Reference 4) to reflect present design:

- Addition of Core Spray System 2 for core injection for improved control of Reactor water level per ECR OC-14-00025.
- Removal of Feedwater (FW) System for core injection due to inability of available flow to open the FW Check valves and, due to high flow rates causing difficulty in managing Reactor water level per ECR-OC-14-00025.
- Removal of Containment Spray System for injection due to the flow path delivering flow rates that are not high enough to fill the spray headers per ECR-OC-14-00025.

5. Need for Relief/Relaxation and Basis for the Relief/Relaxation

None

6. Open Items and Confirmatory items from Overall Integrated Plan and Interim Safety Evaluation

The following tables provide a summary of the open and Confirmatory items documented in the Overall Integrated Plan or the Draft Safety Evaluation (SE) and the status of each item.

Section Reference	Overall Integrated Plan Open Items	Status
Sequence of events (p. 10-12)	The times to complete actions in the Events Timeline are based on operating judgment, conceptual designs, and current supporting analyses. The final timeline will be time validated once detailed designs are completed and procedures developed.	Started
Sequence of events (p. 11-12)	Initial evaluations were used to determine the fuel pool timelines. Formal calculations will be performed to validate this information during development of the spent fuel pool cooling strategy detailed design.	Started
Identify how strategies will be deployed in all modes (p. 13)	<ol style="list-style-type: none">1. Transportation routes will be developed from the equipment storage area to the FLEX staging areas.2. Identification of storage areas is an open item.3. An administrative program will be developed to ensure pathways remain clear or compensatory actions will be implemented to ensure all strategies can be deployed during all modes of operation.	<ol style="list-style-type: none">1. Started2. Started3. Started

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Identify how the programmatic controls will be met (p. 14)	An administrative program for FLEX to establish responsibilities, and testing & maintenance requirements will be implemented.	Started
Maintain Spent Fuel Pool Cooling (p.36)	Complete an evaluation of the spent fuel pool area for steam and condensation.	Started
Safety Functions Support (p. 44)	Evaluate the habitability conditions for the Main Control Room and develop a strategy to maintain habitability.	Started
Safety Functions Support (p. 44)	Develop a procedure to prop open battery room doors upon energizing the battery chargers to prevent a buildup of hydrogen in the battery rooms.	Tracked in Interim Safety Evaluation Confirmatory Items reference section 3.2.4.2.A
Sequence of events (p. 10)	Issuance of BWROG document NEDC-33771P, "GEH Evaluation of FLEX Implementation Guidelines" on 01/31/2013 did not allow sufficient time to perform the analysis of the deviations between Exelon's engineering analyses and the analyses contained in the BWROG document prior to commencing regulatory reviews of the Integrated Plan.	Complete Reference 3
Baseline coping capability (p. 27)	In response to NRC Order EA-12-049 and implementation of EPG Rev 3, containment venting is not required for FLEX. Modifications and capabilities of the hardened Vent system will be IAW OC extension request for EA-13-109.	Started Reference 10: Oyster Creek Request for Extension to Comply with NRC Order EA-13-109 (06-02-14, RS-14-081) Reference 11: Oyster Creek Vent Order Extension Request RAI Response (09-26-14, RS-14-243) Reference 12: Oyster Creek Vent Order Extension Request Supplemental RAI Response (11-25-14, RS-14-318)

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Section Reference	Interim Safety Evaluation Open Items	Status
None	None	NA

Section Reference	Interim Safety Evaluation Confirmatory Items	Status
3.1.1.3.A	Confirm that the licensee develops a reference source describing what actions should be taken if instruments were lost due to a seismic event.	Started
3.1.1.4.A	Confirm the location of the off-site staging area(s) and acceptability of the access routes considering the seismic, flooding, high wind and snow, ice and extreme cold hazard.	Started
3.1.2.2.A	Confirm that if temporary flood barriers are used, they are stored such that they can be easily deployed.	Complete Reference 6
3.1.3.1.A	Verify that the separation of the planned outdoor storage areas is sufficient to preclude damage of both sets of FLEX equipment.	Started
3.1.3.1.B	Confirm qualified storage locations for the hurricane and extreme snow and icing hazards are identified.	Started
3.1.3.2.A	Confirm that the licensee's evaluation of water quality and resulting action are sufficient to preclude blockage of flow to the core or SFP.	Started
3.2.1.1.A	Confirm that benchmarks are identified and discussed that demonstrate that MAAP is an appropriate code for the simulation of an ELAP event at your facility.	Complete Reference 6
3.2.1.1.B	Confirm that the collapsed level remains above Top of Active Fuel (TAF) and the cool down rate remains within technical specifications limits.	Complete Reference 6
3.2.1.1.C	Confirm that MAAP is used in accordance with Sections 4.1, 4.2, 4.3, 4.4, and 4.5 of the June 2013 position paper.	Complete Reference 6
3.2.1.1.D	Confirm that the licensee identifies and justifies the subset of key modeling parameters cited from Tables 4-1 through 4-6 of the "MAAP Application	Complete Reference 6

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Section Reference	Interim Safety Evaluation Confirmatory Items	Status
	<p>Guidance, Desktop Reference for Using MAAP Software, Revision 2" (Electric Power Research Institute Report 1020236). This should include response at a plant-specific level regarding specific modeling options and parameter choices for key models that would be expected to substantially affect the ELAP analysis performed for that licensee's plant. Although some suggested key phenomena are identified below, other parameters considered important in the simulation of the ELAP event by the vendor / licensee should also be included.</p> <ul style="list-style-type: none"> a. Nodalization b. General two-phase flow modeling c. Modeling of heat transfer and losses d. Choked flow e. Vent line pressure losses f. Decay heat (fission products / actinides / etc.) 	
3.2.1.1.E	<p>Confirm that the specific MAAP analysis case that was used to validate the timing of mitigating strategies in the Integrated Plan is identified and available on the ePortal for NRC staff to view. Alternately, a comparable level of information may be included in the supplemental response. In either case, the analysis should include a plot of the collapsed vessel level to confirm that TAF is not reached (the elevation of the TAF should be provided) and a plot of the temperature cool down to confirm that the cool down is within technical specifications limits.</p>	Complete Reference 6
3.2.1.3.A	<p>The SOE final timeline will be time validated once detailed designs are completed and procedures are developed. The licensee should provide the results for NRC staff review.</p>	Not Started
3.2.4.2.A	<p>The licensee stated that battery room ventilation to address high/low temperatures and prevention of hydrogen buildup will be addressed through procedure changes and that the proposed methods of ventilation, open doors and fans, will be confirmed during the detailed design process.</p>	Not Started
3.2.4.4.A	<p>The NRC staff has reviewed the licensee communications assessment (ADAMS Accession</p>	Started

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Section Reference	Interim Safety Evaluation Confirmatory Items	Status
	Nos. ML12306A199 and ML13056A135) in response to the March 12, 2012 50.54(f) request for information letter for OCNBS and, as documented in the staff analysis (ADAMS Accession No. ML13114A067) has determined that the assessment for communications is reasonable, and the analyzed existing systems, proposed enhancements, and interim measures will help to ensure that communications are maintained. Verification of required upgrades has been identified as a confirmatory item.	
3.2.4.8.A	Confirm the procedures to isolate the vital USS's from the generator.	Started
3.2.4.8.A	Ensure that the diesel generator is equipped with overload protection in the generator skid.	Complete – Reference 8 - Fleet FLEX Generator Specification No. FUKGEN-001 Rev 2; Reference 9 - Exelon Fukushima FLEX 500KW Portable Generator Submittal Rev. 0.
3.2.4.8.B	Confirm/review technical basis and/or calculations provided as basis for the generator sizing.	Started
3.2.4.10.A	Confirm completion of analysis to determine battery coping time with no actions and with battery load shed.	Started
3.4.A	NEI 12-06, Section 12.2 lists minimum capabilities for offsite resources for which each Licensee should establish the availability. Confirm implementation of Guidelines 2 through 10 in NEI 12-06, Section 12.2.	Complete – Oyster Creek has executed contractual agreements with Pooled Equipment Inventory Company (PEICo) which allows for the capabilities (considerations) in Section 12.2 of NEI 12-06. National SAFER Response Center, NSRC, submitted a paper to the NRC detailing the capability and ability to meet all of NEI 12-06 Section 12.2 considerations (ML1425A223).

7. Potential Draft Safety Evaluation Impacts

ECR (Engineering Change Request) OC 14-00025 update to the Oyster Creek Interim Staff Response (Reference ML14030A513) related to the OIP for makeup to the Reactor Vessel and Recirculation Pump's seal leakage states the following:

"Make up to the Reactor Vessel is commenced 3.3 hours (based on the revised MAAP run, Reference 5 to ECR OC 14-00025) from the start of the event. The flow rate credited by the MAAP is 100 gpm. It is postulated that this flow rate will be delivered, at the same time as the makeup to the Isolation Condensers (IC). This is a reasonable maximum requirement as the Isolation Condenser makeup will be cycled on and off as needed and RPV makeup will be slowed considerably when Reactor Level is brought back into its normal band.

Once re-established, the amount of makeup is to account for inventory loss. A maximum make up flow of 50 gpm to the Reactor Pressure Vessel is required to keep the core covered. This is derived from a 5 gpm leak rate from each of the five Reactor Recirculation Pumps' seals when the pumps stop because of the Extended Loss of AC Power (ELAP) that is postulated. (5 pumps X 5 gpm = 25 gpm total).

The leakage rate is derived from Atomic Energy Canada Limited (AECL) reports ET-S-331, Testing of the CAN2A Seal Cartridge under Station Blackout Conditions, and ET-S-426, Testing of the CAN2A Seal Cartridge under Station Blackout Conditions – Phase 2 (References 2.9 and 2.9A to ECR OC 14-00025). Note that the AECL reports were done for Nine Mile Point. The Recirculation Pumps at Oyster Creek use the same AECL seals. Attachment 12 to ECR OC 14-00025 provides data that the Nine Mile Point Unit 1 seals use the same design as Oyster Creek.

To the 25 gpm, the normal allowable leak rate is added. Tech Spec 3.3.D, allows a 5 gpm Unidentified Leakage limit and a 25 gpm Total (Identified + Unidentified) leakage limit. Therefore, makeup rate is 50 gpm. Further, four of the five Reactor Recirculation pumps will be isolated (per the time line in the OIP) at three hours. Therefore, actual lost inventory at three hours postulating maximum Tech Spec allowable leakage is 30 gpm."

8. References

The following references support the updates to the Overall Integrated Plan described in this enclosure.

1. Exelon Generation Company, LLC letter to NRC, Oyster Creek Nuclear Generating Station, Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)," dated February 28, 2013 (RS-13-023)
2. NRC Order Number EA-12-049, "Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," dated March 12, 2012
3. Exelon Generation Company, LLC letter to NRC, Oyster Creek Nuclear Generating Station, First Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order EA-12-049), dated August 28, 2013 (RS-13-125)

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4. Exelon Generation Company, LLC letter to NRC, Oyster Creek Nuclear Generating Station, Second Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order EA-12-049), dated February 28, 2014 (RS-14-013)
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 7. MAAP Analysis Oyster Creek Generating Station Document Number OC-MISC-010
 8. Fleet FLEX Generator Specification No. FUKGEN-001 Rev. 2
 9. Exelon Fukushima FLEX 500KW Portable Generator Submittal Rev. 0.
 10. Oyster Creek Request for Extension to Comply with NRC Order EA-13-109, dated June 2, 2014 (RS-14-081)
 11. Oyster Creek Vent Order Extension Request RAI Response, dated September 26, 2014 (RS-14-243)
 12. Oyster Creek Vent Order Extension Request Supplemental RAI Response, dated November 25, 2014 (RS-14-318)
9. Attachments
- None