



# Exelon Generation®

Oyster Creek Nuclear Generating Station  
Route 9 South  
PO Box 388  
Forked River, NJ 08731

[www.exeloncorp.com](http://www.exeloncorp.com)

NEI 99-04

RA-17-086

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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 – 2017

Enclosed is the Oyster Creek Nuclear Generating Station Commitment Change Summary Report for regulatory commitments during calendar year 2017. This report is being submitted in accordance with the guidance provided by NEI 99-04.

Please contact Tom Powell at (609) 971-2279 if any further information or assistance is needed.

Sincerely,

Timothy Moore  
Vice President  
Oyster Creek Nuclear Generating Station

Attachment – Summary of Commitment Changes

cc: Administrator, USNRC Region I  
USNRC Senior Project Manager, Oyster Creek  
USNRC Senior Resident Inspector, Oyster Creek

ADD  
NRR

Attachment  
Summary of Commitment Changes

The following U.S. Nuclear Regulatory Commission (NRC) commitments tracked in the Oyster Creek Nuclear Generating Station (OCNGS) commitment-tracking database were changed during the calendar year 2017. These changes were evaluated in accordance with Exelon Generation Company, LLC (Exelon) Procedure LS-AA-110, *Commitment Management*, and determined to require NRC notification in this Commitment Change Summary Report, consistent with the guidance provided in NEI 99-04, "Guidelines for Managing NRC Commitments".

16-001: Backup Pressure Regulator

Original Commitment and Revised Commitment - If one of the two regulators become inoperable while operating between 25% and 90%, the pressure regulator will be repaired or power will be increased to above 90% power within the next two hours. The previous restrictions on operation between 25% and 90% are NOT required IF a specific analysis is performed for operation in this region.

Justification - In 2000 OCNGS submitted Licensee Event Report (LER) 2002-002-02, "Unanalyzed Condition with Backup Pressure Regulator Inoperable Between 25% and 90 % Power". This LER stated that OCNGS was not analyzed to operate with one pressure regulator between 25% and 90%. As part of the corrective actions OCNGS committed to operate, above 90% power or below 25% Core Thermal Power, for no longer than 30 days with one pressure regulator out of service.

In 2005, General Electric (GE) performed an evaluation, (GE-NE-0000-0043-3118 R0), in which they determined that if the station experienced a pressure regulator failure while having only one in service OCNGS will still be bounded by other transient event analysis and there will be no impact to fuel operating limits. This analysis was incorporated into the Updated Final Safety Analysis Report (UFSAR), Section 15.2.1 in 2005.

After this analysis was performed, it was incorporated into the UFSAR therefore the conditions for which the commitment was made in LER 2002-002-02 no longer exist and the commitment is no longer needed.

17-001: Vendor Interface

Original Commitment and Revised Commitment - This change refers to commitments made in response to both NRC Generic Letters (GLs) 83-28 and 90-03. Exelon will discontinue the program of periodic contact with the vendors of other (non- Nuclear Steam System Supplier (NSSS)) key safety-related components. The program with the NSSS vendor which covers all the safety-related components within the NSSS scope of supply will not be affected.

Justification - The periodic re-contact of vendors is redundant. The reliability of safety related components at OCNGS is assured by preventive maintenance and performance monitoring actions implemented after the commitments made in response to these two NRC GLs. The preventive maintenance tasks, frequencies, and detailed actions are subject to continuous improvement and monitoring for effectiveness.

17-002: Vital AC Power 96-Hour to 7-Day Limit

Original Commitment and Revised Commitment – This change refers to commitments made in response to NRC GL 91-11. Station procedure revisions were made that imposed a 96-hour time limit restriction for vital AC power panels redundancy. The bases for this limit was that it provided a - “reasonable amount of time” - to make repairs and assure minimal exposure risks described in GL-91-11.

OCNGS revised the affected procedures to change the 96-hour limitation to a 7-day limitation to be consistent with the Technical Specifications (TS) as applied to other safety related AC electrical power panels.

Justification - The 96-hour restriction was arbitrarily chosen since there is no restriction applied to vital AC power panels in the TS. To allow for repairs to vital AC power supplies and return redundancy to vital AC power systems, a repair window of 96-hours may be too restrictive to facilitate adequate repairs and return redundancy to these systems. Additionally, the 7-day time restriction is consistent with the TS for minimizing exposure risks identified in GL-91-11.