

RA-18-010

January 24, 2018

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: Supplement to Relief Request for Extension of Torus Examinations

- References:
1. Exelon Generation Company, LLC letter to USNRC, Submittal of Relief Request for Extension of Torus Examinations in Accordance with 10 CFR 50.55a(z)(1), dated December 19, 2017 (ML17353A008)
 2. Exelon Generation Company, LLC letter to USNRC, "Permanent Cessation of Operations at Oyster Creek Nuclear Generating Station," dated January 7, 2011

In Reference 1, Exelon Generation Company, LLC (EGC) requested relief for Oyster Creek Nuclear Generating Station (Oyster Creek) from the current examination requirements of Containment Shell (Torus) performed in accordance with American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI "Rules for Inservice Inspection of Nuclear Power Plant Components", Subsection IWE, to allow a 16-month extension for the torus visual inspections currently required to be performed in the OC1R27 Refuel Outage (September 2018). Reference 1 requested this relief under the provisions of 10 CFR 50.55a(z)(1) as a proposed alternative that would provide an acceptable level of safety.

The purpose of this letter is to provide a supplement to Reference 1 to revise the basis for the subject relief request from 10 CFR 50.55a(z)(1) to 10 CFR 50.55a(z)(2) since compliance with the specified requirements of 10 CFR 50.55a would result in hardship without a compensating increase in the level of quality and safety.

As described in Reference 2, Oyster Creek plans to permanently shutdown on December 31, 2019. The proposed relief request (Reference 1) extends the torus examinations from the OC1R27 Refuel Outage (September 2018) to January 31, 2020, at which time the plant is expected to be in the permanently shutdown condition. EGC has evaluated the extensive resources required for planning and execution of torus desludging as well as the worker radiation dose exposures resulting from performance of torus inspections. The torus desludging process and the torus examinations typically accumulate 1 to 1.2 Rem total exposure to plant

personnel based on previous torus examinations performed. The requested extension would avoid unnecessary personnel radiological dose exposures resulting from the performance of the torus desludging and inspection in the OC1R27 Refuel Outage, and is consistent with Oyster Creek ALARA goals and objectives.

As described in Reference 1, EGC established the technical evaluation basis for the requested extension of the torus inspection from 48 months to 64 months based on the detailed evaluation of previous torus inspection results. The technical evaluation provided in Reference 1 concluded that torus structural integrity will be adequately maintained, and the ECCS strainer acceptance criteria will continue to be satisfied, for the inspection interval extension from 48 months to 64 months. Therefore, it is concluded that no unacceptable structural degradation of the torus would occur as a result of continued plant operation during the 16-month extension duration.

Therefore, it is concluded that performance of the torus inspection in the OC1R27 Refuel Outage (September 2018) as currently required by ASME Section XI results in hardship without a compensating increase in the level of quality and safety in accordance with 10 CFR 50.55a(z)(2).

This letter contains no new regulatory commitments. If you have any questions regarding this letter, please contact David Distel at 610-765-5517.

Respectfully submitted,



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Exelon Generation Company, LLC

cc: NRC Regional Administrator - Region I
NRC Senior Resident Inspector – Oyster Creek Nuclear Generating Station
NRC Project Manager, NRR – Oyster Creek Nuclear Generating Station
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