

**Sarah Rich**

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**From:** John Richmond , *RI*  
**Sent:** Friday, November 14, 2008 2:36 PM  
**To:** Mary Baty; David Pelton  
**Subject:** DRAFT OC Preliminary Notification  
**Attachments:** OC PNO-Nov-2008\_Drywell\_rev-1.doc

**Importance:** High

please provide any comments to me ASAP. We plan to issue this PN on Monday, Nov 17.

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From: John Richmond <John.Richmond@nrc.gov>  
To: Mary Baty <Mary.Baty@nrc.gov>, David Pelton <David.Pelton@nrc.gov>  
Importance: high  
Date: Fri, 14 Nov 2008 14:36:11 -0500  
Subject: DRAFT OC Preliminary Notification  
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Message-ID:  
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Preliminary Notification

DCS No.: 0500021911XX08  
Date: November XX, 2008

PRELIMINARY NOTIFICATION OF EVENT OR UNUSUAL OCCURRENCE PNO-1-08-XXX

Facility

Licensee Emergency Classification

AmerGen Energy Company, LLC  
Oyster Creek  
Forked River, New Jersey  
Docket: 50-219

- Notification of Unusual Event
- Alert
- Site Area Emergency
- General Emergency
- Not Applicable

Subject: RESULTS OF IMPLEMENTATION OF OYSTER CREEK LICENSE RENEWAL COMMITMENTS RELATED TO THE PRIMARY CONTAINMENT (DRYWELL)

The NRC staff conducted an on-site inspection of AmerGen's actions related to license renewal commitments to be implemented during the 2008 refueling outage at the Oyster Creek Nuclear Generating Station (OCNGS). In particular, the NRC review involved a multi-week inspection of AmerGen's three aging management programs associated with the primary containment (drywell): Containment Metallic Liner Inservice Inspection; Structures Monitoring Program; and Protective Coating Monitoring and Maintenance Program. In accordance with the NRC's agreement with the State of New Jersey, State Engineers observed portions of the NRC's staff review. Based on the results of the NRC's inspection activities to date, the NRC staff concluded there were no safety significant conditions with respect to the primary containment that would prohibit plant startup.

In the mid-1980s, GPU Nuclear (previous licensee) identified corrosion of the drywell containment steel shell in the sand bed region. Initial licensee actions were not effective in arresting corrosion. In 1992, all sand was removed from the sand bed region and the accessible exterior surfaces of the drywell shell were cleaned and coated with epoxy. Ultrasonic test (UT) thickness measurements of the drywell shell taken in 1992 and 1996 indicated the corrosion had been effectively arrested. This information was confirmed in 2006, during a refueling outage.

On October 24, 2008, OCNGS shut down for a refueling and maintenance outage. Scheduled outage work included implementation of various license renewal aging management programs.

During the 2008 refueling the NRC's drywell shell inspection focused on:

1. Results of drywell shell UT thickness measurements.
2. Direct observation of drywell shell conditions both inside the drywell, including the floor trenches, and outside the drywell, in the sand bed regions.
3. Condition and integrity of the drywell shell epoxy coating, including AmerGen's activities to evaluate and repair four small coating blisters found in Bay-11.
4. Condition and integrity of the drywell shell moisture barrier seal between the shell and the sand bed floor, including AmerGen's activities to evaluate and repair identified cracks in moisture barrier seals in multiple sand bed bays, including a seal crack in Bay-3 which also exhibited small rust stains.
5. AmerGen's activities to monitor, evaluate, mitigate water leakage from the reactor refueling cavity onto the external surface of the drywell shell and into the sand bed regions.

## Preliminary Notification

On a sampling basis, the NRC staff had the following observations of AmerGen's implementation of license renewal commitments, during the 2008 refueling outage:

1. All drywell shell UT thickness measurements satisfied AmerGen's acceptance criteria and current licensing basis design requirements.
2. There were no identified significant conditions affecting the drywell shell structural integrity. As described below, there were several problems identified during AmerGen's implementation of license renewal commitments.
3. The as-found condition of the external drywell shell epoxy coating, in the sand bed regions, was acceptable, except for four small coating blisters found in Bay-11. The blisters were repaired. AmerGen reported that some blistering was expected, and would be identified during routine visual examinations. The NRC staff will review AmerGen's cause evaluation when it is complete.
4. The as-found condition of the external drywell shell moisture barrier seal, between the shell and the sand bed floor, was acceptable, except for multiple surface cracks, which did not appear to completely penetrate the seal. The identified seal cracks were repaired. During one crack repair, in Bay-3, some drywell shell surface corrosion was identified and repaired.
5. AmerGen's activities to monitor and mitigate water leakage from the reactor refueling cavity onto the external surface of the drywell shell and into the sand bed regions was, in general, acceptable, with a few noted exceptions as described below.

On the fourteenth day of outage, water leakage from the reactor refueling cavity into the cavity drain trough, as monitored in the trough's drain line, increased from less than 1 gallon per minute (gpm) to approximately 5 to 7 gpm. Some spill-over from the cavity drain trough appeared to occur, which resulted in some water entry into the sand bed region. AmerGen enhanced its leakage monitoring, re-opened all sand bed bays, and performed visual inspections to detect any water entry. Water puddles were identified in several sand bed bays. After the cavity was drained and the leakage stopped, NRC and AmerGen performed direct inspections of the sand bed bays; no adverse conditions were identified. To determine whether any increased drywell shell corrosion may have occurred, as a result of this leakage, AmerGen stated additional UT thickness measurements would be performed in the next refueling outage, in 2010.

AmerGen identified and fixed problems found in sand bed Bay-3 and Bay-11, during license renewal aging management program implementation. The drywell shell epoxy coating and the moisture barrier seals, both in the sand bed region, are barrier systems used to protect the drywell shell from corrosion. The problems identified with these barriers had a minimal impact on the drywell shell, and the projected shell corrosion rate remained very small.

Based on a review of the technical information, the NRC staff determined AmerGen had an adequate basis to restart OCNGS.

The State of New Jersey has been notified and no further updates are planned.

This PN is being issued for information only and will not be updated.

ADAMS Accession Number: ML.....

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**Preliminary Notification**

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