Cheryl Miskey

From: Doug Tifft, RI
Sent: Wednesday, November 19, 2008 12:27 PM
To: John Richmond
Subject: OC PN issue
Attachments: NJ engineer comments on OC PN.doc

I wrote up something for when we have to brief management. Can you look over it for accuracy, and add in our take on item #5, I couldn't remember that one.

thanks,
-Doug

6/21

Received: from R1CLSTR01.nrc.gov ([148.184.99.7]) by R1MS01.nrc.gov
([148.184.99.10]) with mapi; Wed, 19 Nov 2008 12:26:50 -0500
Content-Type: application/ms-tnef; name="winmail.dat"
Content-Transfer-Encoding: binary
From: Doug Tifft <Doug.Tifft@nrc.gov>
To: John Richmond <John.Richmond@nrc.gov>
Date: Wed, 19 Nov 2008 12:26:48 -0500
Subject: OC PN issue
Thread-Topic: OC PN issue
Thread-Index: AclKbAC79eMuDRUzRkSz81xFBeW7Fg==
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X-MS-Exchange-Organization-SCL: -1
X-MS-TNEF-Correlator:
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TO BE WITHHELD FOR EXEMPTION 5

NRC Discussions with NJ DEP Engineers

Background

On Tuesday 11/18, John Richmond had a conversation with two NJ DEP engineers (Rich Pinney and Ron Zak). These engineers accompanied John Richmond on the license renewal commitments inspection and expressed concerns that the PN the NRC issued on Monday 11/17 omitted some relevant information. Additionally, the NJ DEP engineers felt that the MOU was effectively a 'gag order' preventing them from informing the public. John Richmond explained to the NJ DEP engineers that the purpose of the PN was an outreach to provide preliminary inspection information to the public prior to Oyster Creek restarting from the refueling outage. It was also explained to the NJ DEP engineers that the NRC had not come to a conclusion on the issues they expressed, although we did conclude there are no immediate safety concerns to prevent restart. The conclusions will be included in our inspection report, scheduled for issuance in mid January.

The Region is already aware that NJ intends to publish a report that contradicts our inspection report, after our inspection report is issued.

NJ DEP Engineer Concerns

The NJ DEP engineers' concerns are listed below, along with the NRC's perspective on each issue:

1. Strippable coating de-lamination
    - The strippable coating used to line the containment liner was identified to be de-laminated in areas of the drywell.
2. Disconnected tubing from sand bed drain line poly bottles
    - During the outage, the tubing from the sand bed to the poly bottles were found to be disconnected for two of the five poly bottles. The poly bottles are used to quantify leakage from the sand bed region. There was no evidence of water leakage and therefore no consequence of these lines being disconnected.
3. 1/2 inch deep standing water in the sand bed bays
    - The licensee identified water in two of eleven sand bed bays. This was initially characterized by the licensee as moisture, then as a puddle, then as less than ½ inch deep. The NRC does not believe there was
4. No confidence [sic] in AmerGen's monitoring of sand bed drains, while the plant is on-line (e.g., water could enter a sand bed bay and go undetected)
    - The potential for water to leak into the sand bed bays exist during refueling outages when the reactor is flooded up. While the plant is online, there is no postulated source of water to leak into the sand bed bays. The NJ DEP engineers were unable to postulate a source of water to leak into the sand bed bays during normal operation, but stated that you could not be certain leakage did not exist.
5. Brightly rust colored water found in bay 17, on Friday 11/14 [in other bays, the water was not described as brightly rust colored]
    -
6. No proof that there is not large [entire surface] areas of rust under the epoxy coating (e.g., the issue may have been mischaracterized as only a small area of one identified blister, versus significant corrosion that has not been evaluated)

- The epoxy coating was applied to arrest corrosion. There have been small areas where the epoxy coating has blistered; however there is no evidence that the epoxy coating is not effective where it is in good condition.

7. Corrosion rate of steel shell, in a broken blister, would be the same as uncoated steel, and will be significantly higher that the predicted corrosion rate of the same steel inside an unbroken blister, because in the past, the sand bed region experienced the loss of at least 1/2 inch of steel due to corrosion
    - Corrosion rates of steel are well known. The site did experience a high corrosion rate of ½ inch over approximately 10 year period before the sand was removed from the sand bed bays. Wet sand directly against the steel accelerated the corrosion rate. The current configuration with the sand removed is not conducive to this higher corrosion rate. The NRC agrees with the licensee's assessment that a broken blister would corrode significantly between inspections.

Next Steps

On Tuesday 11/18, NRC staff members held a meeting to discuss next steps. The agreed upon next steps were:

- Call State of NJ DEP management to determine if the concern the engineers raised to our inspector was shared NJ DEP management.
    - IN PROGRESS: Patrick Mulligan, Chief NJ DEP BNE. (supervisor of inspectors J. Richmond spoke to) Pat had not heard the concerns from the inspector and doesn't expect these issues will be elevated. Pat will talk to the engineers to better understand their issues. Pat will call back Marjey later today or tomorrow. Marjey will followup with Doug and John tomorrow.
- Notify Karl Farrar of the email for potential IG considerations:
    - COMPLETE
- Marjey, Doug, and John discuss response from NJ DEP management to determine if additional actions are necessary and report back to Marsha.
    - INCOMPLETE