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Vice President
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August 4, 2003

Mr. Robert L. Clark
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555-0001

SUBJECT: Sixty (60) Day Response to Generic Letter (GL) 2003-01, Control Room Habitability
R.E. Ginna Nuclear Power Plant
Docket No 50-244

Reference: Letter from R.C. Mecredy, RG&E, to R.L. Clark, NRC, Subject: License Amendment Request Regarding Revision of Ginna Technical Specification Sections 1.1, 3.3.6, 3.4.16, 3.6.6, 3.7.9, 5.5.10, 5.5.16, and 5.6.7 Resulting From Modification of the Control Room Emergency Air Treatment System and Change in Dose Calculation Methodology to Alternate Source Term, dated May 21, 2003.

Dear Mr. Clark:

On June 12, 2003 the NRC issued GL 2003-01, Control Room Habitability. The purpose of the letter is as follows:

(1) *Alert addressees to findings at U.S. power reactor facilities suggesting that the control room licensing and design bases, and applicable regulatory requirements may not be met, and that existing technical specification surveillance requirements (SRs) may not be adequate,*

(2) *Emphasize the importance of reliable, comprehensive surveillance testing to verify control room habitability,*

(3) *Request addressees to submit information that demonstrates that the control room at each of their respective facilities complies with the current licensing and design bases, and applicable regulatory requirements, and that suitable design, maintenance and testing control measures are in place for maintaining this compliance, and*

(4) *Collect the requested information to determine if additional regulatory action is required.*

The GL requested the following information within 180 days of the date of the GL:

1. *Provide confirmation that your facility's control room meets the applicable habitability regulatory requirements (e.g., GDC 1, 3, 4, 5, and 19) and that the CRHSs [Control Room Habitability Systems] are designed, constructed, configured, operated, and maintained in accordance with the facility's design and licensing bases. Emphasis should be placed on confirming:*

   (a) *That the most limiting unfiltered inleakage into your CRE [Control Room Envelope] (and the filtered inleakage if applicable) is no more than the value assumed in your design basis radiological analyses for control room habitability. Describe how and when you performed the analyses, tests, and measurements for this confirmation.*

   (b) That the most limiting unfiltered inleakage into your CRE is incorporated into your hazardous chemical assessments. This inleakage may differ from the value assumed in your design basis radiological analyses. Also, confirm that the reactor control capability is maintained from either the control room or the alternate shutdown panel in the event of smoke.

   (c) That your technical specifications verify the integrity of the CRE, and the assumed inleakage rates of potentially contaminated air. If you currently have a ΔP surveillance requirement to demonstrate CRE integrity, provide the basis for your conclusion that it remains adequate to demonstrate CRE integrity in light of the ASTM E741 testing results. If you conclude that your ΔP surveillance requirement is no longer adequate, provide a schedule for: 1) revising the surveillance requirement in your technical specification to reference an acceptable surveillance methodology (e.g., ASTM E741), and 2) making any necessary modifications to your CRE so that compliance with your new surveillance requirement can be demonstrated.

   If your facility does not currently have a technical specification surveillance requirement for your CRE integrity, explain how and at what frequency you confirm your CRE integrity and why this is adequate to demonstrate CRE integrity.

2. *If you currently use compensatory measures to demonstrate control room habitability, describe the compensatory measures at your facility and the corrective actions needed to retire these compensatory measures.*

3. *If you believe that your facility is not required to meet either the GDC, the draft GDC, or the "Principal Design Criteria" regarding control room habitability, in addition to responding to 1 and 2 above, provide documentation (e.g., Preliminary Safety Analysis Report, Final Safety Analysis Report sections, or correspondence) of the basis for this conclusion and identify your actual requirements.*

The GL further states:

> *If an addressee cannot provide the information or cannot meet the requested completion date, the addressee should submit a written response indicating this within 60 days of the date of this generic letter. The response should address any alternative course of action the addressee proposes to take, including the basis for the acceptability of the proposed alternative course of action and the schedule for completing the alternative course of action.*

For reasons described below, Rochester Gas and Electric (RG&E) has elected to provide a 60 day response to this generic letter.

RG&E has undertaken a voluntary initiative to upgrade the Control Room Emergency Air Treatment System (CREATS). The project includes installing a two train, safeguards powered re-circulation and filtration system in place of the current single train system. In addition, RG&E elected to update and standardize the dose analysis using the Alternate Source Term methodology in Regulatory Guide 1.183. New dose calculations have been performed for the Control Room assuming the design parameters of the new CREATS. Offsite doses were also re-calculated as part of this project. New atmospheric dispersion coefficients have been calculated for the Control Room using ARCON96 and for off-site using PAVAN. A Control Room Toxic Gas Analysis has also been performed to ensure that the concentrations are bounded by the inleakage assumed in the dose analysis. Smoke infiltration will be addressed using the guidance in Regulatory Guide 1.196 and NEI 99-03.

The entire package, including new Technical Specifications and surveillance requirements, has been submitted for NRC review in the form of a License Amendment Request (LAR) dated May 21, 2003 (reference 1). After completion of construction, and implementation of the new Technical Specifications, RG&E will perform a tracer gas in-leakage test to verify the assumptions in the dose analysis.

RG&E has signed a contract with a vendor to perform the detailed design, fabrication, and installation of two new CREATS trains. The present schedule would have the new CREATS system installed by June 30, 2004, and tracer gas in-leakage testing performed by September 30, 2004. These activities are contingent on NRC approval of the above mentioned LAR (reference1) by May 21, 2004. Any delay in receiving NRC approval will delay installation and testing of the new system.

Performing the activities required for the 180-day response on our existing system would divert resources from the design and fabrication of the new system and possibly delay the effort. Therefore, RG&E believes that the most practical and effective approach to resolving the issues described in the GL is to continue with the current initiative and schedule. If you have any questions or require additional information, please contact Mr. Mike Ruby at 585-771-3572.

Very truly yours,

Robert C Mecredy

Att: Attachment A, List of Commitments

cc: Mr. Robert Clark (Mail Stop O-8-C2A)
Project Directorate I
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U.S. NRC Ginna Senior Resident Inspector

Attachment 1

List of Regulatory Commitments

The following table identifies those actions committed to by RG&E in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments. Please direct questions regarding these commitments to Mike Ruby, 585-771-3572.

REGULATORY COMMITMENT	DUE DATE
Install new CREATS system	June 30, 2004
Address smoke infiltration using guidance in Reg Guide 1.196 and NEI 99-03	June 30, 2004
Perform tracer gas inleakage testing of the CRE after new CREATS system installed	September 30, 2004

Note: Assumes NRC approval of previously submitted LAR (reference 1) by May 21, 2004. Any delay in approval of this LAR will result in a delay in implementing these commitments.