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U. S. Nuclear Regulatory Commission  
Washington, DC 20555

**ATTENTION:** Document Control Desk

**SUBJECT:** R.E. Ginna Nuclear Power Plant  
Docket No. 50-244

Submittal of Relief Request PR-3 Related to the Requirements of 10CFR50.55a(f)

In accordance with 10 CFR 50.55a(f)(4)(iv), and the guidance contained in NUREG 1482, revisions 0 and 1, Section 2.1, "Compliance Considerations", and Regulatory Information Summary (RIS) 2004-12, R.E. Ginna Nuclear Power Plant, LLC (Ginna LLC) requests approval to adopt a subsequent edition and addenda's of the ASME code. Specifically, Ginna LLC plans to adopt all related requirements of subsections ISTA, "General Requirements" and ISTB, "In-service Testing of Pumps in Light-Water Reactor Nuclear Power Plants" of the ASME OM Code, 2001 Edition through 2003 Addenda for the "family" of (5) Auxiliary Feedwater (AFW) (two preferred motor-driven, one turbine driven, and two standby motor-driven) pumps currently included in the 4th Interval In-Service Test (IST) Program (excluding the ISTB-3550 flow rate measurement requirement for which separate relief {PR-3} is being requested).

As such, the (5) pumps will be categorized in accordance with ISTB-1300 as follows:

**GROUP A PUMPS**

- "A" preferred motor-driven AFW pump
- "B" preferred motor-driven AFW pump

**GROUP B PUMPS**

- Turbine-driven AFW pump
- "C" standby motor-driven AFW pump
- "D" standby motor-driven AFW pump

In accordance with subsection ISTB-5000, each pump will be tested quarterly per the applicable Group A and Group B required tests, and each pump will undergo a biennial Comprehensive Pump Test (CPT). It is intended that effective May 1, 2006 these (5) pumps will begin to be tested in accordance with the ASME OM Code, 2001 edition through 2003 addenda, as the current testing protocol requires a reactivity change and also introduces a potential for intrusion of service water into the steam generators.

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The "A" and "B" preferred motor-driven and "C" and "D" standby motor-driven AFW pumps do not have installed flow instrumentation in the hydraulic test circuit being employed (recirculation line) during quarterly pump testing. Based upon the guidance previously established in Position 9 of Generic Letter (GL) 89-04, Ginna LLC is submitting an attached relief request to allow not measuring flow rate during the quarterly pump testing but to perform pump differential pressure and vibration measurements as required for these (4) pumps. A CPT will be performed for these pumps every 24 months at design flow conditions. During performance of the CPT, the hydraulic test circuit will be the associated steam generator flow path (s), each of which has pump flow rate measurement capability. Ginna LLC believes this combination of test processes comprises an acceptable alternative to the Code requirements.

The turbine-driven AFW pump has installed flow instrumentation on the hydraulic test circuit (recirculation line) which can be employed during the quarterly testing which will be utilized to measure flow rate. This pump will also receive a CPT every 24 months at design flow conditions and the associated hydraulic test circuit has flow measurement capability. Therefore, a relief request is not necessary for this pump.

Due to the desire to institute the program changes as soon as practical, Ginna LLC requests NRC approval of relief request PR-3 by May 1, 2006.

Should you have questions regarding the information in this submittal, please contact Mr. Robert Randall at (585) 771-3535 or [Robert.Randall@constellation.com](mailto:Robert.Randall@constellation.com).

Very truly yours,

A handwritten signature in black ink, reading "Mary G. Korsnick". The signature is fluid and cursive, with the first letters of each word being capitalized and prominent.

Mary G. Korsnick

Attachments: Relief Request PR-3

cc: S. J. Collins, NRC  
P.D. Milano, NRC  
Resident Inspector, NRC (Ginna)

# **GINNA STATION IN-SERVICE TESTING PROGRAM**

## **RELIEF REQUEST PR-3**

**SYSTEM:** Auxiliary Feedwater

**PUMPS:** Auxiliary Feedwater (AFW) Pumps (Group A Pumps-PAF01A, PAF01B and Group B Pumps-PSF01A, PSF01B)

**SAFETY CLASS:** 3

**FUNCTION:** Maintain steam generator water level to provide a secondary heat sink for reactor coolant system (RCS) residual heat removal when the normal feedwater system is not available.

**TEST REQUIREMENT:** When measuring flow rate, a rate or quantity meter shall be installed in the pump test circuit (ASME OM CODE 2001 through 2003 Addenda, ISTB-3550, Flow Rate).

**BASIS FOR RELIEF:** Compliance with the code is impractical because of design limitations in that a flow rate measuring device is not installed in the associated pump recirculation line being employed as the pump test circuit. Costly major hardware modifications would be required to provide a permanent flow measuring device in each affected line. Flow is not variable due to an installed flow orifice which establishes a nominal 40 gpm flow rate when the pump is operated in the recirculation mode.

**ALTERNATE TESTING:** Ginna Station will perform quarterly pump discharge pressure, differential pressure and vibration measurement for the (2) Group A AFW pumps and a differential pressure measurement for the (2) Group B AFW pumps. In addition, all (4) AFW pumps will undergo a biennial Comprehensive Pump Test (CPT) during which the pump will be tested at design flow conditions. This test protocol is consistent with previous NRC guidance (Generic Letter 89-04) regarding the use of minimum flow lines that do not have flow measurement capability.