

April 30, 2015

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

R. E. Ginna Nuclear Power Plant
Renewed Facility Operating License No. DPR-18
NRC Docket No. 50-244

Subject: R. E. Ginna Nuclear Power Plant Response to Request for Additional Information
Regarding Proposed License Amendment to Revise Technical Specifications to
Adopt TSTF-523

- References:
- (1) Letter from D. T. Gudger (Exelon Generation Company, LLC) to U.S. NRC, "Application to Revise Technical Specifications to Adopt TSTF-523, 'Generic Letter 2008-01, Managing Gas Accumulation,' Revision 2, using the Consolidated Line Item Improvement Process," dated July 10, 2014 (ML14191A255)
 - (2) Letter from A. Chereskin (U.S. Nuclear Regulatory Commission) to D. T. Gudger (Exelon Generation Company, LLC), "Calvert Cliffs Nuclear Power Plant, Unit Nos. 1 and 2; Nine Mile Point Nuclear Station, Unit No. 2; and R. E. Ginna Nuclear Power Plant- Request for Additional Information Regarding License Amendment Request to adopt Technical Specification Task Force Traveler 523, "Generic Letter 2008-01, Managing Gas Accumulation" (TAC Nos. MF4406, MF4407, MF4408, AND MF4409)" dated April 28, 2015 (ML15100A211)

By letter dated July 10, 2014 (Reference 1), Exelon Generation Company, LLC (Exelon), requested an amendment to the Technical Specifications (TS) for R. E. Ginna Nuclear Power Plant (Ginna) to address Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems," as described in TSTF-523, Revision 2, "Generic Letter 2008-01, Managing Gas Accumulation."

The U.S. Nuclear Regulatory Commission (USNRC) staff has been reviewing the Reference 1 submittal and has determined that additional information is needed to complete the review. The USNRC staff requested additional information on April 9, 2015 (Reference 2). A teleconference between Exelon and the USNRC was held on April 13, 2015 to discuss and clarify the RAI question.

Exelon's response to the USNRC request is provided in Attachment 1 to this letter. A revised Technical Specification Page is provided in Attachment 2.

Exelon has determined that the information provided in response to this request for additional information does not impact the conclusions of the No Significant Hazards Consideration or Environmental Consideration as stated in Reference 1.

There are no regulatory commitments contained in this submittal.

In accordance with 10 CFR 50.91, "Notice for public comment; State consultation," paragraph (b), Exelon is notifying the State of New York of this response by transmitting a copy of this letter and its attachment to the designated State Official.

Should you have any questions concerning this letter, please contact Ms. Wendy E. Croft at (610) 765-5726.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 30th day of April, 2015.

Respectfully,

A handwritten signature in black ink, appearing to read "James Barstow", with a stylized flourish at the end.

James Barstow
Director - Licensing and Regulatory Affairs
Exelon Generation Company, LLC

- Attachments:
1. Response to Request for Additional Information Regarding Proposed License Amendment to Revise Technical Specifications to Adopt TSTF-523
 2. Revised Technical Specification Page 3.4.8-2 (Mark-Up) for R. E. Ginna Nuclear Power Plant

cc: USNRC Region I, Regional Administrator
USNRC Project Manager, Ginna
USNRC Senior Resident Inspector, Ginna
A. L. Peterson, NYSERDA

ATTACHMENT 1

**Response to Request for Additional Information Regarding
Proposed License Amendment to Revise Technical Specifications to Adopt TSTF-523**

**R. E. Ginna Nuclear Power Plant
Renewed Facility Operating License No. DPR-18**

Attachment 1

April 30, 2015

Response to Request for Additional Information Regarding Proposed License Amendment to Revise Technical Specifications to Adopt TSTF-523

By letter dated July 10, 2014 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML14191A255), Exelon Generation Company, LLC (Exelon) submitted a license amendment request for R. E. Ginna Nuclear Power Plant (Ginna). The proposed amendment would revise Technical Specification (TS) requirements to address Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems," in accordance with TS Task Force (TSTF) Traveler TSTF-523, Revision 2.

USNRC Question

In Attachment 1 of the submittal, the licensee stated that the proposed amendment was consistent with TSTF-523, Revision 2. TSTF-523, Revision 2, has been approved for plant-specific adoption by the NRC.

In Attachment 2c of the submittal, the new Surveillance Requirement (SR) for Limiting Condition for Operation (LCO) 3.4.8 (i.e., SR 3.4.8.3) uses the wording "Verify required RHR loop locations" versus the approved TSTF wording, "Verify RHR loop locations...." When an LCO requires two trains of the RHR to be OPERABLE, TSTF-523 does not use the qualifier "required" in the SR language; therefore, the SR 3.4.8.3 wording is inconsistent with TSTF-523.

The word "required" is redundant since LCO 3.4.8 requires both trains of RHR to be OPERABLE, and in every other instance throughout the submittal when two trains of RHR are required to be OPERABLE, the word "required" is not used in the associated SR.

Please provide a submittal that uses language consistent with the approved traveler or provide a technical justification for the deviation.

Ginna Response

Exelon is providing a proposed Ginna TS Page 3.4.8-2 that uses language consistent with the approved traveler, specifically by deleting the word "required" in SR 3.4.8.3. The revised TS Page is provided in Attachment 2.

All other proposed TS and TS Bases Page changes in the Exelon letter dated July 10, 2014 (ADAMS Accession No. ML14191A255) are unaffected by this submittal.

ATTACHMENT 2

**Revised Technical Specification Page 3.4.8-2 (Mark-Up) for
R. E. Ginna Nuclear Power Plant**

**R. E. Ginna Nuclear Power Plant
Renewed Facility Operating License No. DPR-18**

CONDITION	REQUIRED ACTION	COMPLETION TIME
	B.2 Initiate action to restore one RHR loop to OPERABLE status and operation.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.4.8.1	Verify one RHR loop is in operation.	12 hours
SR 3.4.8.2	Verify correct breaker alignment and indicated power are available to the RHR pump that is not in operation.	7 days
SR 3.4.8.3	Verify RHR loop locations susceptible to gas accumulation are sufficiently filled with water.	31 days