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**Subject:** [External\_Sender] Ginna SFP comparison to section 3.3 of EPRI 3002007148  
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3.3 Site-Specific SFP Criteria for Low GMRS Sites Sections 3.1 and 3.2 provide evaluation criteria that can be applied at sites where the GMRS peak spectral acceleration ( $S_a$ ) is less than 0.8g. The following parameters should be verified on a site-specific basis to confirm that the evaluation criteria applies to the site.

Site Parameters:

1. The site-specific GMRS peak spectral acceleration at any frequency should be less than or equal to 0.8g.

Response – the peak spectral acceleration at any frequency is 0.25g

Structural Parameters:

2. The structure housing the SFP should be designed using an SSE with a peak ground acceleration (PGA) of at least 0.1g.

Response – the SSE used for the Spent Fuel Pool is 0.2g

3. The structural load path to the SFP should consist of some combination of reinforced concrete shear wall elements, reinforced concrete frame elements, post-tensioned concrete elements and/or structural steel frame elements.

Response – the Spent Fuel Pool walls are constructed of reinforced concrete

4. The SFP structure should be included in the Civil Inspection Program performed in accordance with Maintenance Rule

Response – the Spent Fuel Pool is in the Ginna Structural Monitoring program, and subject to the Maintenance Rule

Non-Structural Parameters: (the criteria below assumes the site and structural criteria above (items 1-4) are satisfied)

5. To confirm applicability of the piping evaluation in Section 3.2, piping attached to the SFP up to the first valve should have been evaluated for the SSE

Response – the spent Fuel Pool Cooling System is seismic Category I, evaluated for the SSE

6. Anti-siphoning devices should be installed on any piping that could lead to siphoning water from the SFP. In addition, any cases where active anti-siphoning devices attached to 2-inch or smaller piping have extremely large extended operators, the valves should be walked down to confirm adequate lateral support

Response – A passive anti-siphoning device is installed on the requisite piping

7. To confirm applicability of the sloshing evaluation in Section 3.2, the maximum SFP pool horizontal dimension (length or width) should be less than 125 ft, the SFP depth should be greater than 36 ft, and the GMRS peak  $S_a$  should be  $< 0.1g$  at frequencies equal to or less than 0.3 HZ

Response – The maximum Spent Fuel Pool width is 38.2 ft, the Spent Fuel pool is 36.4 ft deep, and the GMRS is less than 0.04 g at frequencies below 0.3 HZ

8. To confirm applicability of the evaporative loss evaluation in Section 3.2, the SFP surface area should be greater than 500 square feet and the licensed core thermal power should be less than 4,000MWt

Response – the SFP surface area is approximately 886 square feet, and Ginna licensed thermal power is 1775 MWt

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