

NRR-PMDAPEm Resource

From: Mozafari, Brenda
Sent: Wednesday, October 05, 2016 12:31 PM
To: 'Lynch, Laura:(GenCo-Nuc)'
Cc: Tate, Travis; Bucholtz, Kristy; Shoop, Undine; Render, Diane
Subject: FW: Draft RAI regarding CAC 7339, TSTF-490

Importance: High

(This Draft is sent to facilitate clarification call at 1pm today. The final version will be processed and available in ADAMS)

Laura, while we are finalizing the administrative processing of the clarification of the RAI I am providing the draft shown below:

SUBJECT: R.E. GINNA NUCLEAR POWER PLANT - REQUEST FOR ADDITIONAL INFORMATION REGARDING: DELETION OF E BAR DEFINITION AND REVISION TO REACTOR COOLANT SYSTEM SPECIFIC ACTIVITY TECHNICAL SPECIFICATIONS (CAC NO. MF7339)

Dear Mr. Hanson:

By letter dated February 4, 2016, as supplemented by letters dated April 14, and June 28, 2016 (Agencywide Documents Access and Management System (ADAMS) Accession Number ML16035A015, ML16105A243, and ML16180A448), Exelon Generation Company, LLC the licensee, proposes changes to R. E. Ginna Nuclear Power Plant (Ginna) Technical Specifications (TS). The licensee's amendment would revise Ginna's TS Reactor Coolant System (RCS) Specific Activity definition and associated surveillance requirements. The proposed changes would replace the current TS limit for RCS gross specific activity with a new limit for RCS noble gas specific activity. The noble gas specific activity limit would be based on a new dose equivalent Xenon-133 definition that would replace the current E-Bar average disintegration energy definition. The changes are consistent with Technical Specification Task Force (TSTF) Standard Technical Specification Traveler, TSTF-490, Revision 0, "Deletion of E Bar Definition and Revision to RCS Specific Activity Tech Spec."

The Nuclear Regulatory Commission staff is reviewing the submittal and has determined that additional information is needed to complete its review. The specific questions are found in the enclosed request for additional information (RAI). On October 5, 2016, Exelon staff was informed that a response to the RAI would be needed within 30 days of the date of this letter.

REQUEST FOR ADDITIONAL INFORMATION

REGARDING DELETION OF E BAR DEFINITION AND REVISION TO REACTOR COOLANT SYSTEM SPECIFIC ACTIVITY

TECHNICAL SPECIFICATIONS

R. E. GINNA NUCLEAR POWER PLANT, LLC

EXELON GENERATION COMPANY, LLC

DOCKET NOS. 50-244

R. E. GINNA NUCLEAR POWER PLANT

By the application dated February 4, 2016 (Agencywide Documents Access and Management System (ADAMS) Accession Number ML16035A015), Exelon Generation Company, LLC the licensee, proposes changes to R. E. Ginna Nuclear Power Plant (Ginna) Technical Specifications (TS). The licensee's amendment would revise Ginna's TS Reactor Coolant System (RCS) Specific Activity definition and associated surveillance requirements. The proposed changes would replace the current TS limit for RCS gross specific activity with a new limit for RCS noble gas specific activity. The noble gas specific activity limit would be based on a new dose equivalent Xenon-133 definition that would replace the current E-Bar (\bar{E}) average disintegration energy definition. The changes are consistent with Technical Specification Task Force (TSTF) Standard Technical Specification Traveler, TSTF-490, Revision 0, "Deletion of E Bar Definition and Revision to RCS Specific Activity Tech Spec."

During the Nuclear Regulatory Commission (NRC) staff's review of the impact of implementing TSTF-490 the NRC staff determined that more information was needed to complete the review. The NRC staff requested the licensee provide additional justification for the proposed change to increase the Completion Time of Required Action B.1 to 48 hours and why it is acceptable to be in an unanalyzed condition for 48 hours (ADAMS accession Number ML16075A119). On April 14, 2016 the licensee responded to the NRC staff's request and on June 28, 2016 submitted a supplement to their response (ADAMS Accession Numbers ML16105A243 and ML16180A448).

The licensee's response provided a sensitivity analysis that varied dose equivalent Xenon-133 (DEX). The sensitivity analysis concluded that the DEX necessary to challenge the Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, Section 50.67 limit is substantially greater than the proposed DEX TS limit, and without further dose equivalent Iodine-131 spiking, would require more than 100 percent of fuel rods to be failed. This analysis was performed specifically for the steam generator tube rupture and main steam link break accidents. The NRC staff has reviewed the licensee's response and has determined that the sensitivity analysis is not complete because it lacks an evaluation of the failure of small lines carrying primary coolant outside containment comparison to the 10 CFR 100 limits.

A review of NUREG-0944, "Safety Evaluation Report Related to a Full-Term Operating License for the R.E. Ginna Nuclear Power Plant," NUREG-0821, "Integrated Plant Safety Assessment Systematic Evaluation Program R. E. Ginna Nuclear Power Plant," and Ginna's updated final safety analysis report shows that the failure of small lines carrying coolant outside containment is part of Ginna's current licensing basis. The NRC staff notes that further review determined that an alternative source term was not implemented for this failure analysis. Therefore, the failure of small lines carrying coolant outside containment utilizes Ginna's original license source term and the doses calculated must continue to remain below 10 percent of the thyroid and whole body doses stated 10 CFR 100, as stated in standard review plan 15.6.2, "Radiological Consequences of the Failure of Small Lines Carrying Primary Coolant outside Containment."

ARCB-RAI-1

The NRC staff is requesting that the licensee please provide additional justification for the proposed change to increase the TS Completion Time of Required Action B.1 to 48 hours that explains why it is acceptable to be in an unanalyzed condition for 48 hours with regard to the failure of small lines carrying primary coolant outside containment or alternatively the licensee can request to maintain the current TS completion time for the gross specific activity not with limit of 8 hours.

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