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Subject: Ginna - TSTF 547 Adoption, REQUEST FOR ADDITIONAL INFORMATION (RAI)
Date: Wednesday, August 15, 2018 4:20:00 PM
Attachments: [Ginna - TSTF 547 Adoption REQUEST FOR ADDITIONAL INFORMATION.docx](#)

Please find the attached RAI for your application dated June 25, 2018 (Agencywide Documents Access and management System (ADAMS) Accession No. ML18176A327), Exelon Generation Company, LLC (the licensee) submitted a license amendment request (LAR) to revise the R. E. Ginna Nuclear Power Plant (Ginna) Technical Specifications (TSs) by adopting Technical Specifications Task Force (TSTF) change TSTF-547, "Clarification of Rod Position Requirements."

Please submit the response to these 3 RAIs in 30 days by September 17, 2018.

If you have any questions, please contact me at (301) 415-2597.

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REQUEST FOR ADDITIONAL INFORMATION

REQUESTING LICENSE AMENEDMENT REQUEST TO

ADOPT TSTF-547, "CLARIFICATION OF ROD POSITION REQUIREMENTS"

EXELON GENERATION COMPANY, LLC

R. E. GINNA NUCLEAR POWER PLANT

DOCKET NO. 50-244

By application dated June 25, 2018 (Agencywide Documents Access and management System (ADAMS) Accession No. ML18176A327), Exelon Generation Company, LLC (the licensee) submitted a license amendment request (LAR) to revise the R. E. Ginna Nuclear Power Plant (Ginna) Technical Specifications (TSs) by adopting Technical Specifications Task Force (TSTF) change TSTF-547, "Clarification of Rod Position Requirements." The Reactor Systems Branch (SRXB) staff has determined that the following additional information is needed in order to complete its review.

1. Condition A in LCO 3.1.5 and LCO 3.1.6

The proposed TS changes would add a new Condition A to limiting Condition for Operation (LCO) 3.1.5, "Shutdown Bank Insertion Limit", and LCO 3.1.6, "Control Bank Insertion Limits". The proposed Condition A in both LCOs is applicable when one bank is inserted ≤ 8 steps beyond the insertion limit specified in the Core Operating Limits Report. The NRC staff states in its safety evaluation (ADAMS Accession No. ML15328A350) approving TSTF-547 that the bracketed number [16] should be replaced with plant specific minimum number of steps that the rods must be moved to ensure correct performance of Surveillance Requirement (SR) 3.1.4.2.

Provide the plant specific justification for use of ≤ 8 steps in Condition A in LCOs 3.1.5 and 3.1.6 in accordance with the NRC staff SE approving TSTF-547.

2. SR 3.1.4.2

The proposed Ginna SR 3.1.4.2 requires movement of control and shutdown rods a minimum of 8 steps in either direction. The value of 8 steps required for the minimum rod movement is different from the value of 10 steps in the corresponding SR 3.1.4.2 of TSTF-547. Section 2.2 of the LAR dated June 25, 2018 indicated that difference in the values of the minimum required rod movement is due to the differences between Digital Rod Position Indication (DRPI) and Microprocessor Rod Position Indication (MRPI) used in Ginna.

Discuss the determination of the value of 8 steps used in Ginna SR 3.1.4.2 based on Ginna's MRPI, and address acceptability of the use of 8 steps as the minimum rod movement in Ginna SR 3.1.4.

3. SR 3.1.4.2 and Condition A in LCOs 3.15 and 3.1.6

TSTF-547 uses the different values of 10 steps and [16 steps, a plant specific value] for the required rod movement in SR 3.1.4.2, and Condition A of LCOs 3.15 and 3.1.6, respectively, while Ginna uses the same value of 8 steps for both SR 3.1.4.2 and Condition A in LCOs 3.1.5 and 3.1.6.

Justify the use of the same value of 8 steps in the corresponding Ginna SR and Condition A compared to the different values for SR 3.1.4.2 and Condition A of LCOs 3.15 and 3.1.6 respectively approved in the NRC staff SE for TSTF-547.