

10CFR50.55a

January 8, 2020

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

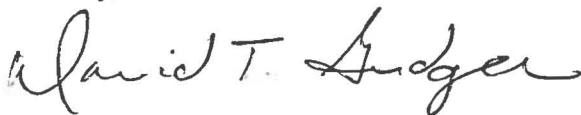
Subject: Submittal of the Snubber Program Plan for the Sixth 10-Year Interval

In accordance with the ASME OM Code-2012 Edition, attached for your information is a copy of the Snubber Program Plan for the R. E. Ginna Nuclear Power Plant, associated with the sixth ten-year Inservice Testing (IST) interval. The new interval began on January 1, 2020 and concludes on December 31, 2029.

There are no regulatory commitments contained within this submittal.

If you have any questions or require additional information, please contact David Neff (267) 533-1132.

Sincerely,



David T. Gudger
Senior Manager - Licensing
Exelon Generation Company, LLC

Attachment: R. E. Ginna Nuclear Power Plant Snubber Program Plan for the Sixth 10-Year Interval, ER-GI-330-1008, Revision 0

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

ATTACHMENT

**R. E. Ginna Nuclear Power Plant
Snubber Program Plan for the Sixth 10-Year Interval
ER-GI-330-1008, Revision 0**



R. E. GINNA NUCLEAR POWER PLANT
15003 Lake Road
Ontario, New York 14519

SNUBBER INSERVICE TESTING PROGRAM PLAN

SIXTH 10-YEAR INTERVAL

Commercial Service Date: June 1, 1970
NRC Docket Number: 50-244
Sixth IST Interval: January 1, 2020 through December 31, 2029

Document Number: ER-GI-330-1008
Revision Number: 00

PREPARED BY:	Danielle Mainardi <i>Danielle Mainardi</i>	DATE:	10/1/2019
	Snubber Program Owner		
REVIEWED BY:	Timothy Seo <i>[Signature]</i>	DATE:	10/31/2019
	Engineering Programs		
APPROVED BY:	Sailaja Mokkalapati <i>Sailaja</i>	DATE:	11/12/2019
	Supervisor Engineering Programs		

Exelon Generation Company
R. E. Ginna Nuclear Power Plant Sixth Interval

REVISION LOG

This re-written program plan is the initial issue of the Snubber Program Plan after transition from the ASME ISI Code, Section XI to the ASME OM Code, Section IST. Beginning January 1, 2020, the snubber program will be under the OM Code, Section IST and will thereafter be aligned with the IST 10 Year Interval. The Sixth IST 10 Year Interval is currently scheduled to end on December 31, 2029.

Description	Prepared By	Date	Reviewed By	Date	Approved By	Date
Sixth Interval Snubber Program Plan	_____		_____		_____	

Exelon Generation Company
R. E. Ginna Nuclear Power Plant Sixth Interval

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Exelon Generation Company
R. E. Ginna Nuclear Power Plant Sixth Interval

1.0 General:

- 1.1 The examination, service life monitoring and testing of all safety related snubbers at R. E. Ginna Nuclear Power Plant (Ginna) will be implemented and performed in accordance with ER-GI-330-1007, "Snubber Inservice Testing Program" to assess the required operational readiness of these snubbers during a seismic or other event, initiating dynamic loads.
- 1.2 The Snubber program, as defined within ER-GI-330-1007, establishes visual examination, operational readiness testing and service life monitoring requirements, pertaining to all program snubbers that are required for safe shutdown of the reactor, maintaining the safe shutdown condition, mitigating the consequences of an accident, or to ensure the integrity of the reactor coolant pressure boundary.
 - 1.2.1 The examination boundaries are the snubber assembly from pin to pin inclusive. Integral and nonintegral attachments for snubbers will be evaluated within the Ginna ISI program, in accordance with the requirements of the ASME Code Section XI, 2013 Edition.
 - 1.2.2 The snubbers included in this program are identified within the ER-GI-330-1007 Snubber IST Program Document.
- 1.3 The Snubber Program described in ER-GI-330-1007 adheres to the requirements of ASME OM Code, Section IST, 2012 Edition, as required by 10CFR50.55a(b)(3)(v)(B).

2.0 Examination, Testing and Monitoring Requirements:

- 2.1 Visual Examinations and Operational Readiness Testing will be performed to the extent specified within ER-GI-330-1007 and in accordance with Exelon fleet administrative procedures ER-AA-330-004 and ER-AA-330-010.
- 2.2 Snubbers are grouped into Defined Test Plan Groups, (DTPG's) by design type, and in accordance with ISTD-5252 and ISTD-5253 for testing purposes. The DTPG's at Ginna are specified in ER-GI-330-1007.
- 2.3 The Service Life of all snubbers in this program will be monitored and snubbers replaced or reconditioned as specified in ER-GI-330-1007 and required by Exelon fleet administrative procedure ER-AA-330-011 to ensure that the service life is not exceeded before the next scheduled system or plant outage, or during a period when the snubber is required to be operable. The replacement or reconditioning of snubbers will be documented, and records retained in accordance with Ginna Procedures.

3.0 Examination and Testing Methods:

- 3.1 Visual Examinations will be performed by individuals qualified in accordance with ISTA-1500(e). Visual Examinations and Operational Readiness Testing shall be performed to verify the requirements specified within ER-GI-330-1007 in accordance with the requirements of Subsection ISTD.

Exelon Generation Company
R. E. Ginna Nuclear Power Plant Sixth Interval

4.0 Examination and Testing Frequency:

- 4.1 Inservice Visual Examinations and Pre- and In-service Operational Readiness Testing will be performed at the frequency specified within ER-GI-330-1007.
- 4.2 Preservice Visual Examinations will be performed whenever new snubber locations are installed, or after system replacements or modifications as specified in ER-GI-330-1007 in accordance with Subsection ISTD-4100.

5.0 ASME OM Code Case, OMN-13

- 5.1 Code Case OMN-13 Rev. 2, which allows the extension of the visual examination interval, is approved for use by the NRC in Regulatory Guide 1.192 Rev. 2 (March 2017) and will be used during the Sixth Interval upon approval of Ginna Relief Request SR-1, submitted June 26, 2019.

6.0 Examination, Testing and Monitoring Evaluation:

- 6.1 Snubbers that do not appear to conform to the Visual Examination requirements of ER-GI-330-1007 and procedure ER-AA-330-004, will be evaluated and appropriate corrective action taken.
- 6.2 Snubbers that do not appear to conform to visual examination acceptance requirements and are later confirmed as operable as a result of operational readiness testing, may be declared operable for the purpose of establishing the next visual examination interval, providing that the unacceptable condition did not affect operational readiness of the snubber.
- 6.3 Snubbers that do not meet the Operational Readiness Testing acceptance criteria in ER-GI-330-1007 and procedure ER-AA-330-010 will be evaluated to determine the cause of the failure and appropriate corrective action will be taken.
- 6.4 The service life of every snubber is evaluated at least once each fuel cycle using manufacturing input and engineering information gained through consideration of the snubber service conditions and inservice Operational Readiness test results in accordance with ER-GI-330-1007.

7.0 Repair, Replacement and Modification Requirements:

- 7.1 Repairs, Replacements and Modifications performed on snubbers under this program shall conform, as applicable, to the requirements specified within the Ginna Repair and Replacement Program.

8.0 Scheduling:

- 8.1 The Visual Examinations and Operational Readiness Testing schedules will be established, tracked and maintained within the Programs Engineering Department.
- 8.2 The Snubber Testing Program will identify, and track expanded, or additional testing and/or examinations as specified and required by ER-GI-330-1007 in accordance with Subsection ISTD.

Exelon Generation Company
R. E. Ginna Nuclear Power Plant Sixth Interval

9.0 Reports and Records:

- 9.1 Reports and records for the Visual Examinations and Operational Readiness Testing will be maintained on all snubbers in the scope of the program as specified in ER-GI-330-1007.
- 9.2 Applicable records and reports, as required for Repair and Replacements, will be maintained for all snubbers as specified in ER-GI-330-1007.
- 9.3 Records of the service life of all program snubbers listed in this program, including the date at which the service life commences, and associated installation and maintenance records will be maintained as specified in ER-GI-330-1007.



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