

From: [Sreenivas, V](#)
To: [Hodge, Jessie D:\(Exelon Nuclear\)](#); [Loomis, Thomas R:\(Exelon Nuclear\)](#)
Cc: [Danna, James](#); [Klein, Paul](#); [Bloom, Steven](#)
Subject: Ginna: RAI-Steam Generator LAR to revise Technical Specifications for Steam Generator tube inspection frequency - EPIDS L-2020-LLA-0207
Date: Wednesday, March 17, 2021 10:53:00 AM

Request for Information (RAI):

By letter dated September 21, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20265A198) Exelon Generation Company, LLC, submitted the License Amendment Request (LAR) to revise Technical Specifications for Steam Generator tube inspection frequency for R.E. Ginna Nuclear Power Station (Ginna). Specifically, the licensee requested to revise Technical Specifications (TS) 5.5.8, "Steam Generator (SG) Program," to reflect a proposed change to the required SG tube inspection frequency. This request is for a one-time change to modify the SG inspection frequency from the current wording "No steam generator shall operate more than 72 effective full power months or three refueling outages (whichever is less) without being inspected..." to add the phrase "... with the exception that each steam generator is to be inspected during the fourth refueling outage, in G1R44, following inspections that were completed in refueling outage G1R40."

Attachment 1, Section 4.3 "Secondary Side Components," discusses flow accelerated corrosion (FAC) of the secondary moisture separator base plates. During refueling outage G1R40, visual inspection and laser profilometry were performed on all 85 secondary separators in both SGs. The deepest degradation from FAC was measured as 51% through the plate. Given that the G1R44 projected through-thickness degradation of SG A Separator 46 is only 5% less than the value at which analysis predicts base plate perforation,

1. Please discuss any additional conservatisms in the through-wall degradation projections beyond the assumption of when FAC initiated.

Compare the degradation in the Ginna separator 46 base plate to that observed in the two plants of similar design that have identified perforations and discuss why tube integrity will not be affected by potential loose part generation from secondary moisture Separator 46.

Please submit the response to this RAI by March 31, 2021. If you have any questions please contact me at your earliest.

From: Hodge, Jessie D:(Exelon Nuclear) <Jessie.Hodge@exeloncorp.com>
Sent: Wednesday, March 17, 2021 10:26 AM
To: Sreenivas, V <V.Sreenivas@nrc.gov>; Loomis, Thomas R:(Exelon Nuclear) <thomas.loomis@exeloncorp.com>
Subject: [External_Sender] RE: Ginna: DRAFT RAI-Steam Generator LAR - EPIDS L-2020-LLA-0207

The team has received this and has indicated that no clarity call is needed and plan to have

response back by early next week.