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ROBERT C. MECREDDY  
VICE PRESIDENT  
NUCLEAR OPERATIONS

November 5, 2002

Mr. Robert L. Clark  
Office of Nuclear Regulatory Regulation  
U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555

Subject: Supplemental Response to Request for Additional Information Related to  
CREATS Actuation Instrumentation License Amendment Request  
R. E. Ginna Nuclear Power Plant  
Docket No. 50-244

- References:
- (1) Letter from R. Clark, NRC, to R.C. Mecreddy, RG&E, Subject: *Request for Additional Information Regarding R.E. Ginna Nuclear Power Plant (Ginna) License Amendment Request Relating to the Control Room Emergency Air Treatment Actuation Circuitry (TAC No. MB1887)*, dated August 28, 2002.
  - (2) Letter from R. Clark, NRC, to file, Subject: *Summary of Meeting Held on September 24, 2002, with Rochester Gas & Electric Corporation re: Proposed Digital Upgrades to the Emergency Control room Air Treatment system Actuation Instrumentation (TAC No. MB1887)*, dated October 8, 2002.
  - (3) Letter from R.C. Mecreddy, RG&E, to R. Clark, NRC, Subject: *Response to Request for Additional Information Related to CREATS Actuation Instrumentation License Amendment Request*, dated October 7, 2002.

Dear Mr. Clark:

In Reference 1, the NRC provided RG&E with a Request for Additional Information (RAI) related to a proposed license amendment request for Ginna Station concerning the Control Room Emergency Air Treatment System (CREATS) actuation instrumentation (LCO 3.3.6). In response to this RAI, a public meeting was held between RG&E and NRC Staff to discuss the proposed response and schedule (Reference 2). As agreed upon at the public meeting, the responses to the majority of questions were provided in Reference 3. The purpose of this letter is to provide the remaining information in response to the questions documented in Reference 1 (see enclosure).


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I declare under penalty of perjury under the laws of the United States of America that I am authorized by RG&E to make this submittal and that the foregoing is true and correct.

Any questions concerning this submittal should be directed to Mark Flaherty, Manager, Nuclear Safety and Licensing at (585) 771-3275.

Very truly yours,

Executed on November 5, 2002

  
Robert C. Mecredy

- Enclosure - Completion of Response to NRC Request for Additional Information  
(RAI) Dated 8/28/02
- Attachment 1 - Qualification Report 950.366, Rev. 2 (only revised pages pertaining to the  
EMI/RFI testing included)
- Attachment 2 - Software Verification and Validation Report for PROM P/N 94095603  
GM Area Monitor
- Attachment 3 - Model 956A-201 Failure History Summary

xc: Mr. Robert L. Clark (Mail Stop O-8-C2)  
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**Enclosure**

**Completion of Response to NRC Request for Additional Information (RAI) Dated 8/28/02**

The completion of the response to the RAI is structured as follows. RG&E provided responses to each of the specific RAI questions in the submittal dated October 7, 2002, some of which required further information to be provided. The completion of the response to Questions 1, 8, 9, 16, 25, 28, and 32 are provided by this submittal. Specifically, the following discussion is to be used to determine which attachment provides the requested information.

**NRC Question 1**

EMI / RFI testing has been performed to EPRI TR-102323 Rev. 1. Attachment 1 contains the revised pages to the Qualification Report 950.366 that includes coverage of all requirements to this TR.

**NRC Question 8**

A Software Verification and Validation (V & V) has been performed. The V & V Report was performed in accordance with the requirements of IEEE 7-4.3.2, EPRI TR-103291, and EPRI TR-102348, and is submitted as Attachment 2. The V & V Report contains the following documents:

- Software V&V Plan
- Software Requirements Specification (SRS)
- Software Design Description (SDD)
- Software V&V Test Procedure
- Software Requirements Traceability Matrix
- Software V&V Test Report

**NRC Question 9**

The performance of the Software V&V, Attachment 2, addresses this question.

**NRC Question 16**

Inovision (now Syncor Radiation Management) has provided documentation which describes the customer complaints recorded by this process, Attachment 3. This document lists a description of each customer problem, and how it was resolved by Inovision.

### **NRC Question 25**

The Software V&V Report, Attachment 2, address this question.

### **NRC Question 28**

The testing performed during the Software V&V addresses computer functions and diagnostics that are consistent with those used in the actual operation of this design. Setpoints and computer options were selected to match the installation at Ginna Station. The V&V Report, Attachment 2, documents that the V&V replicates the Ginna configuration.

### **NRC Question 32**

Equipment performance issues reported by customers are described in the vendor supplied documentation, Attachment 3.