

December 19, 2003

U.S. Nuclear Regulatory Commission  
Document Control Desk  
Attn: Mr. Russell Arrighi (Mail Stop O-11F1)  
Office of Nuclear Reactor Regulation  
Washington, D.C. 20555-0001

Subject: Draft SER Comments  
R. E. Ginna Nuclear Power Plant  
Docket No. 50-244

Dear Mr. Arrighi:

The purpose of this letter is to 1) provide comments regarding the NRC's draft SER with open items, published October 9, 2003; 2) augment our December 9, 2003 letter concerning open and confirmatory items; and 3) add commitments related to aging management programs and time-limited-aging analyses into the UFSAR Supplement. These issues are addressed in Attachment 1, 2, and 3 to this letter, respectively.

Please address any issues regarding this letter to our License Renewal Project Manager, George Wrobel, at (585) 771-3535.

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.

Very truly yours,

Executed on December 19, 2003

  
Robert C. Mecredy

Attachments

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## Attachment 1: RG&E Comments on Draft SER with Open Items

1. In Section 2.3.3.7.1, second paragraph, the heating steam system is categorized as a high energy system, rather than a moderate energy system. That should have been so designated in Section 2.3.3.7 of the application.
2. In Section 2.4.2.8.1, second paragraph, the term “different” should be replaced by the term “diverse”.
3. In Section 2.5.1, 6th paragraph, add the phrase “17 and 18 serving the service water pumps “after “cables M0089 and M0108 bring offsite power into the safety buses”.
4. In paragraph 3.0.3.3.1, first paragraph, the words “LRA Section XI.M3” should be replaced by “LRA Section B2.1.25”.
5. In paragraph 3.1.2.2.10, the second paragraph should be deleted. RG&E has decided to place the feed rings and J-tubes into our “Steam Generator Integrity Program”, Section B2.1.31.
6. In Section 3.3.2.4.14, it should state that those portions of the Circulating Water System supporting operation of the Service Water System are evaluated within the Service Water System. Those portions providing flood protection are evaluated in the Reactor Protection System. Consequently, within the system evaluation boundary, there are no components that perform License Renewal Intended Functions.
7. In Section 3.3.2.4.17, it should state that any plant sampling components associated with containment isolation are evaluated in the Containment Isolation Components System. Consequently, within the system evaluation boundary, there are no components that perform License Renewal Intended Functions.
8. To be consistent with LRA 4.2.1, the first sentence in paragraph 4.2.1.1 should state “...the limiting weld is expected to decrease to less than 50 ft-lb...”
9. In Section 4.4.1, last paragraph, it should be stated that “...For the equipment that is not expected to be replaced at the end of its qualified life, the applicant has performed reanalyses in accordance with NUREG-1800, Table 4.4-1, and all equipment so analyzed has been qualified through the period of extended operation.”

Attachment 2: 12/9/03 Letter Response Augmentation and 7/11/03 Letter Clarification

1. In the list of Regulatory Commitments, OI 2.3.3.2-2, "Add CCW makeup water piping, valves, and pumps from the RWMT to valve MOV823 into the scope of license renewal", the branch line boundary valves defining this path include the first normally closed valve, or valve closed by procedure to perform that evolution. The boundary valves are normally closed valves 1217, 1218, 1247A, 1247C, 1239, 1245, 1252, 1256A, 1277B, 1277C and 4885; and normally open valve 1262.

All of the piping and valves in these branch lines are included within the component groups in Table 2.3.3-1 of the LRA, as shown in response to CI 2.3.3.2-1 of Attachment 1 to our December 9, 2003 letter.

2. In the list of Regulatory Commitments, OI 3.1.2.3.3-1, the words "and approval" should be added following the words "staff review".
3. In the list of Regulatory Commitments, OI 2.3.3.3-1, "Add spent fuel pool makeup path from RWST to the SFP into the scope of license renewal", the branch line boundary valves defining this flow path include the first normally closed valves 819 and 820. All of the piping and valves in these branch lines are included within the component groups "pipe" and "valve body" in Table 2.3.3-3 of the application, as shown in response to OI 2.3.3.3-1 of Attachment 1 to our December 9, 2003 letter.
4. In the list of Regulatory Commitments, OI 2.3.3.6-1, "Add fire service water booster pump and associated valves and piping back to the SW system into the scope of license renewal", it should be noted that all valves in the branch lines are within the scope of that flow path. The piping and valves are included within the component groups "pipe" and "valve body" in Table 2.3.3-6 of the application as shown in response to OI 2.3.3.6-1 of Attachment 1 of our December 9, 2003 letter.
5. In the list of Regulatory Commitments, OI B2.1.28-1, the first commitment should be modified to read "Withdraw surveillance capsule in Spring 2005, and submit test report of results within one year, in accordance with 10 CFR Part 50, App. H, paragraph IV.A." The due date "prior to 2012" should be deleted.
6. In the list of Regulatory Commitments, CI 3.3.2.3.4-1, the particulate testing standard for diesel generator fuel oil, "ASTM D2276 (or its successor)" should be referenced.

7. An additional commitment should be added as follows:

Regulatory Commitment		Due Date
OI 3.3.2.3.7-3 (September 16, 2003)	Define selection criteria, sample size, and periodicity of inspections for fire system piping.	Prior to September 2009

8. An additional UFSAR Supplement to describe the “Inaccessible Medium-Voltage Cables Not Subject to 10 CFR 50.49 Environmental Qualification Requirements “ Program described in Attachment 2 to our December 9, 2003 letter is as follows:

*Inaccessible Medium-Voltage Cables Not Subject to 10 CFR 50.49  
Environmental Qualification Requirements*

In-scope, medium-voltage cables exposed to significant moisture (exposures of more than a few days at a time) and significant voltage (subject to system voltage more than 25% of the time) are tested at least once every 10 years to provide an indication of the condition of the conductor insulation. The specific type of test performed will be determined prior to the initial test, and is to be a proven test for detecting deterioration of the insulation system due to wetting, such as insulation resistance, polarization index, dissipation factor, and time domain reflectometry.

9. RG&E would also like to clarify our response to C-RAI B2.1.31-1 of our July 11, 2003 letter. In that letter, we noted that steam generator internal components in Table 3.2-2, line numbers (24) and (25) of our license renewal application included all secondary side SG components within the scope of license renewal. These line items cover all carbon/low-alloy steel with Aging Effects of Corrosion, and stainless steel components. However, the feedrings and gooseneck aging effect of concern is flow-accelerated corrosion, and the J-tubes are Inconel Alloy 690. Therefore, new line numbers (35) and (36) are being generated to address these components.

Component Types	Material	Environment	AERMS	Program/Activities	Discussion
(35) SG feedring and feedring gooseneck, and supports	Low-Alloy Steel	Secondary Water	Loss of Material Due to FAC	Water Chemistry Control Program Steam Generator Integrity Program	These material environment combinations are not addressed in NUREG-1801. The SG Integrity Program provides for periodic visual inspections of these components.
(36) J-tubes	Alloy 690	Secondary Water	Loss of Material Due to FAC	Water Chemistry Control Program Steam Generator Integrity Program	These material environment combinations are not addressed in NUREG-1801. The SG Integrity Program provides for periodic visual inspections of these components.“