

April 7, 2004

Dr. Robert C. Mecredy
Vice President, Nuclear Operations
Rochester Gas and Electric Corporation
89 East Avenue
Rochester, NY 14649

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION REGARDING R. E. GINNA
NUCLEAR POWER PLANT LICENSE AMENDMENT REQUEST RELATING TO
THE CONTROL ROOM EMERGENCY AIR TREATMENT SYSTEM
MODIFICATION (TAC NO. MB9123)

Dear Dr. Mecredy:

By letter dated May 21, 2003, as supplemented on December 1, 2003 (two letters), February 16, 2004, March 1, 2004, and March 8, 2004, Rochester Gas & Electric Corporation submitted a request to revise the Ginna Station Improved Technical Specifications to reflect design modifications to the Control Room Emergency Air Treatment System, and elimination of the requirements for the Containment Post Accident Charcoal Filters. The proposed design modifications are based on the use of the alternate source term.

The Nuclear Regulatory Commission (NRC) staff has reviewed the information and based on our review, we have determined that additional information is required in order for the staff to complete its review. Enclosed is the NRC staff's request for additional information (RAI). This RAI was discussed with your staff on March 26, 2004, and it was agreed that your response would be provided within 30 days from the date of this letter.

Sincerely,

/RA/

Robert Clark, Project Manager, Section 1
Project Directorate 1
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-244

Enclosure: RAI

cc w/encl: See next page

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PUBLIC PDI-1 R/F RLauffer SLittle RClark ACRS
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*See previous concurrence

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DATE	04/02/04	04/05/04	04/02/04	04/02/04	04/05/04

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R.E. Ginna Nuclear Power Plant

cc:

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REQUEST FOR ADDITIONAL INFORMATION

R. E. GINNA NUCLEAR POWER PLANT

CONTROL ROOM EMERGENCY AIR TREATMENT SYSTEM

Rochester Gas & Electric Corporation proposed design modifications to the Control Room Emergency Air Treatment System (CREATS), the Control Room Emergency Cooling System (CRECS), and the Containment Post Accident Charcoal Filters, are based on the full scope implementation of the alternate source term (AST). The Nuclear Regulatory Commission (NRC) staff has completed its preliminary review of the license amendment request and has determined that the following additional information is needed to complete its review.

Ginna Specification ME-326

- I. Provide a table describing the following information:
 - a. A list of mechanical and electrical instrumentation and control equipment installed in the modified CREATS and CRECS systems requiring seismic qualification. Indicate whether the equipment is new or existing. Similar equipment can be represented by grouping.
 - b. The location (elevation in a building or structure) of the equipment and the source of the required response spectra, consistent with your licensing basis, to be used for seismic qualification of the equipment.
 - c. Seismic qualification method to be used for the equipment (indicate whether it is based on your licensing basis, or an NRC endorsed industry standard, etc.).
 - d. The results of seismic qualification of the equipment (indicate whether any modification or re-design is necessary).
2. The use of Reference 2.1.13, Institute of Electrical and Electronics Engineers (IEEE) 323-1983, "Standard for Qualifying Class 1E Equipment for Nuclear Power Generating Stations," is not endorsed by the NRC. IEEE 323-1974 or IEEE 323-2003 should be used. Please verify that the new motor control centers, breakers, distribution panels, cables and other electrical equipment associated with the CREATS and the CRECS will be qualified in accordance with IEEE 323-1974 or IEEE 323-2003.
3. The Reference 2.2.3, Ginna Station Floor Response Spectra (FRS) Curves, is not clear. Is it the licensing basis FRS from the final safety analysis report? Please provide the details.
4. In Section 12.4, Structural Load Criteria, provide justifications for the use of the following percentage numbers:

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- a. Section 12.4.2, Live Load 25% of uniform live loads.
 - b. Section 12.4.5, Thermal Loads 2.5% of dead loads.
 - c. Section 12.4.6, Pipe Reactions 2.5% of dead loads.
5. Explain why the Tornado and Missile Loads are not included in Section 12.4 of the Ginna Specification ME-326?
6. In Section 12.5, Structural Load Combinations and Acceptance Criteria, you stated that the subject criteria were approved by the NRC as part of Phase 1 of the Structural Upgrade Program.
- a. Provide a summary of the Phase 1 of the Structural Upgrade Program and the NRC approval reference.
 - b. Explain why pipe-break loads and jet impingement loads were not included.
 - c. Explain why Thermal Loads (T_o), Pipe Reaction Loads (R_o), and Normal Wind Loads (W_n) were defined, but were not included in the Load Combinations.
7. In Section 12.4, you stated that the lateral earth pressure (H) exerted by the soil on the various structures and the buoyant force (F') of the design-basis flood are not applicable to any of the scope of work described in specification ME-326. Yet, in the table in Section 12.5.3, these forces were considered for load combinations for foundation stability. Please explain the purpose of this table, and discuss the effects of the CREATS Modification Project on the factors of safety of the foundation stability.
8. Explain why pipe-break loads were not considered for piping and pipe supports in Section 12.6.2 and Section 12.7.
9. Explain why documentation of seismic qualification of mechanical and electrical instrumentation and control equipment was not included as part of the design documents listed in Section 18.2.

Design Criteria - PCR # 2000-0024, Revision 1

- 1. Sections 9.6 and 9.7, under Mechanical Requirements, clarify whether the requirements in Reference 3.32 (EWR 2512) shall be used for new piping and pipe supports, and the requirements in Reference 3.31(EWR 10182) shall be used for modification to existing piping and pipe supports, respectively. Provide a summary for each document and the NRC-approval reference, and provide any differences in requirements in comparison to those delineated in Attachment B.
- 2. Section 9.8 referenced an Attachment C, but your submittal did not contain an Attachment C. Please clarify discrepancy.