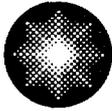


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## **Constellation Energy**

R.E. Ginna Nuclear Power Plant

August 6, 2004

Mr. Robert L. Clark  
Office of Nuclear Regulatory Regulation  
U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D.C. 20555-0001

**Subject: Application for Technical Specification Improvement to Eliminate Requirements for Hydrogen Recombiners and Hydrogen Monitors Using the Consolidated Line Item Improvement Process  
R.E. Ginna Nuclear Power Plant  
Docket No. 50-244**

Dear Mr. Clark:

Pursuant to 10 CFR 50.90, R.E. Ginna Nuclear Power Plant, LLC hereby requests an amendment to the Technical Specifications (TS) for Ginna Station.

The proposed amendment will delete the TS requirements related to hydrogen recombiners and hydrogen monitors. The proposed TS changes support implementation of the revisions to 10 CFR 50.44, "Standards for Combustible Gas Control System in Light-Water-Cooled Power Reactors," that became effective on October 16, 2003. The changes are consistent with Revision 1 of NRC-approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-447, "Elimination of Hydrogen Recombiners and Change to Hydrogen and Oxygen Monitors." The availability of this TS improvement was announced in the Federal Register on September 25, 2003 as part of the consolidated line item improvement process (CLIIP).

Attachment 1 provides a description of the proposed change, the requested confirmation of applicability, and plant-specific verifications and commitments. Attachment 2 provides the existing TS pages marked-up to show the proposed change. Attachment 3 provides revised, clean TS pages. Implementation of TSTF-447 also involves various changes to the TS Bases. The TS Bases changes will be submitted with a future update in accordance with TS 5.5.13, "Technical Specifications (TS) Bases Control Program."

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## **Attachment 1**

### **Description and Assessment**

## Attachment 1

### Description and Assessment

#### 1.0 Introduction

The proposed License amendment deletes Technical Specification (TS) 3.6.7, "Hydrogen Recombiners," and references to the hydrogen monitors in TS 3.3.3, "Post Accident Monitoring (PAM) Instrumentation." The proposed TS changes support implementation of the revisions to 10 CFR 50.44, "Standards for Combustible Gas Control System in Light-Water-Cooled Power Reactors," that became effective on October 16, 2003.

The changes are consistent with Revision 1 of NRC-approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-447, "Elimination of Hydrogen Recombiners and Change to Hydrogen and Oxygen Monitors." The availability of this TS improvement was announced in the *Federal Register* on September 25, 2003 as part of the consolidated line item improvement process (CLIP).

#### 2.0 Description of Proposed Amendment

Consistent with the NRC-approved Revision 1 of TSTF-447, the proposed TS changes include:

TS 3.3.3, Condition E	Inoperable Hydrogen Monitors	Deleted
Table 3.3.1-1	Item 11, Hydrogen Monitors	Deleted
TS 3.6.7	Hydrogen Recombiners	Deleted

As described in NRC-approved Revision 1 of TSTF-447, the changes to TS requirements results in changes to various TS Bases sections. The TS Bases changes will be submitted with a future update in accordance with TS 5.5.13, "Technical Specifications (TS) Bases Control Program."

#### 3.0 Background

The background for this application is adequately addressed by the NRC Notice of Availability published on September 25, 2003 (68 FR 55416), TSTF-447, the documentation associated with the 10 CFR 50.44 rulemaking, and other related documents.

#### 4.0 Regulatory Requirements and Guidance

The applicable regulatory requirements and guidance associated with this application are adequately addressed by the NRC Notice of Availability published on September 25, 2003 (68 FR 55416), TSTF-447, the documentation associated with the 10 CFR 50.44 rulemaking, and other related documents.

## **5.0 Technical Analysis**

R.E. Ginna Nuclear Power Plant, LLC has reviewed the safety evaluation (SE) published on September 25, 2003 (68 FR 55416) as part of the CLIIP Notice of Availability. This verification included a review of the NRC staff's SE, as well as the supporting information provided to support TSTF-447. R.E. Ginna Nuclear Power Plant, LLC has concluded that the justifications presented in the TSTF proposal and the SE prepared by the NRC staff are applicable to Ginna Station and justify this amendment for the incorporation of the changes to the Ginna TS.

## **6.0 Regulatory Analysis**

A description of this proposed change and its relationship to applicable regulatory requirements and guidance was provided in the NRC Notice of Availability published on September 25 (68 FR 55416), TSTF-447, the documentation associated with the 10 CFR 50.44 rulemaking, and other related documents.

### **6.1 Verification and Commitments**

As discussed in the model SE published in the Federal Register on September 25, 2003 (68 FR 55416) for this TS improvement, R.E. Ginna Nuclear Power Plant, LLC is making the following verifications and regulatory commitments:

1. R.E. Ginna Nuclear Power Plant, LLC has verified that a hydrogen monitoring system capable of diagnosing beyond design-basis accidents is installed at Ginna Station and is making a regulatory commitment to maintain that capability. The hydrogen monitors will be included in the Ginna Technical Requirements Manual (TRM). This regulatory commitment will be implemented with implementation of this TS amendment.
2. Ginna Station does not have an inerted containment.

## **7.0 No Significant Hazards Consideration**

R.E. Ginna Nuclear Power Plant, LLC has reviewed the proposed no significant hazards consideration determination published on September 25, 2003 (68 FR 55416) as part of the CLIIP. R.E. Ginna Nuclear Power Plant, LLC has concluded that the proposed determination presented in the notice is applicable to Ginna Station and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

## **8.0 Environmental Evaluation**

R.E. Ginna Nuclear Power Plant, LLC has reviewed the environmental evaluation included in the model SE published on September 25, 2003 (68 FR 55416) as part of the CLIIP. R.E. Ginna Nuclear Power Plant, LLC has concluded that the staff's findings presented in that evaluation are applicable to Ginna and the evaluation is hereby incorporated by reference for this application.

## **9.0 Precedent**

This application is being made in accordance with the CLIP. R.E. Ginna Nuclear Power Plant, LLC is not proposing variations or deviations from the TS changes described in TSTF-447 or the NRC staff's model SE published on September 25, 2003 (68 FR 55416).

## **10.0 References**

Federal Register Notice: Notice of Availability of Model Application Concerning Technical Specification Improvement To Eliminate Hydrogen Recombiner Requirement, and Relax the Hydrogen and Oxygen Monitor Requirements for Light Water Reactors Using the Consolidated Line Item Improvement Process, published September 25, 2003 (68 FR 55416).

## **Attachment 2**

### **Proposed Technical Specification Changes**

3.3 INSTRUMENTATION

3.3.3 Post Accident Monitoring (PAM) Instrumentation

LCO 3.3.3 The PAM instrumentation for each Function in Table 3.3.3-1 shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

- NOTE -

1. LCO 3.0.4 is not applicable.
2. Separate Condition entry is allowed for each Function.

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>A.</p> <p style="text-align: center;">- NOTE - Not applicable to Functions 3 and 4.</p> <p>One or more Functions with one required channel inoperable.</p>	<p>A.1</p> <p>Restore required channel to OPERABLE status.</p>	<p>30 days</p>
<p>B.</p> <p>Required Action and associated Completion Time of Condition A not met.</p>	<p>B.1</p> <p>Initiate action to prepare and submit a special report.</p>	<p>Immediately</p>
<p>C.</p> <p style="text-align: center;">- NOTE - Only applicable to Functions 3 and 4.</p> <p>One or more Functions with required channel inoperable.</p>	<p>C.1</p> <p>Restore required channel to OPERABLE status.</p>	<p>7 days</p>

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>D.</p> <p style="text-align: center;"><del>NOTE - Not applicable to Function 11</del></p> <p>One or more Functions with two required channels inoperable.</p>	D.1 Restore one channel to OPERABLE status.	7 days
<del>E. Two hydrogen monitor channels inoperable.</del>	<del>E.1 Restore one hydrogen monitor channel to OPERABLE status.</del>	<del>72 hours</del>
<p><del>F.</del> Required Action and associated Completion Time of Condition C, D, or <del>E</del> not met.</p>	F.1 Enter the Condition referenced in Table 3.3.3-1 for the channel.	Immediately
<p><del>G.</del> As required by Required Action F.1 and referenced in Table 3.3.3-1.</p>	<p>G.1 Be in MODE 3.</p> <p><u>AND</u></p> <p>G.2 Be in MODE 4.</p>	<p>6 hours</p> <p>12 hours</p>
<p>H. As required by Required Action F.1 and referenced in Table 3.3.3-1.</p>	H.1 Initiate action to prepare and submit a special report.	Immediately

SURVEILLANCE REQUIREMENTS

- NOTE -

SR 3.3.3.1 and SR 3.3.3.2 apply to each PAM instrumentation Function in Table 3.3.3-1.

SURVEILLANCE	FREQUENCY
SR 3.3.3.1 Perform CHANNEL CHECK for each required instrumentation channel that is normally energized.	31 days
SR 3.3.3.2 Perform CHANNEL CALIBRATION.	24 months

Table 3.3.3-1  
Post Accident Monitoring Instrumentation

	FUNCTION	REQUIRED CHANNELS	CONDITION
1.	Pressurizer Pressure	2	<del>8</del> F
2.	Pressurizer Level	2	<del>8</del> F
3.	Reactor Coolant System (RCS) Hot Leg Temperature	1 per loop	<del>8</del> F
4.	RCS Cold Leg Temperature	1 per loop	<del>8</del> F
5.	RCS Pressure (Wide Range)	2	<del>8</del> F
6.	RCS Subcooling Monitor	2	<del>8</del> F
7.	Reactor Vessel Water Level	2	H G
8.	Containment Sump B Water Level	2	<del>8</del> F
9.	Containment Pressure (Wide Range)	2	<del>8</del> F
10.	Containment Area Radiation (High Range)	2	H G
<del>11.</del>	<del>Hydrogen Monitors</del>	<del>2</del>	<del>G</del>
<del>11</del> <del>42:</del>	Condensate Storage Tank Level	2	<del>8</del> F
<del>12</del> <del>13:</del>	Refueling Water Storage Tank Level	2	<del>8</del> F
<del>13</del> <del>44:</del>	Residual Heat Removal Flow	2	<del>8</del> F
<del>14</del> <del>45:</del>	Core Exit Temperature-Quadrant 1	2(a)	<del>8</del> F
<del>15</del> <del>46:</del>	Core Exit Temperature-Quadrant 2	2(a)	<del>8</del> F
<del>16</del> <del>47:</del>	Core Exit Temperature-Quadrant 3	2(a)	<del>8</del> F
<del>17</del> <del>48:</del>	Core Exit Temperature-Quadrant 4	2(a)	<del>8</del> F
<del>18</del> <del>49:</del>	Auxiliary Feedwater (AFW) Flow to Steam Generator (SG) A	2	<del>8</del> F
<del>19</del> <del>20:</del>	AFW Flow to SG B	2	<del>8</del> F
<del>20</del> <del>21:</del>	SG A Water Level (Narrow Range)	2	<del>8</del> F
<del>21</del> <del>22:</del>	SG B Water Level (Narrow Range)	2	<del>8</del> F

Table 3.3.3-1  
Post Accident Monitoring Instrumentation

	FUNCTION	REQUIRED CHANNELS	CONDITION
<del>22-23</del>	SG A Water Level (Wide Range)	2	<del>8</del> F
<del>23-24</del>	SG B Water Level (Wide Range)	2	<del>8</del> F
<del>24-25</del>	SG A Pressure	2	<del>8</del> F
<del>25-26</del>	SG B Pressure	2	<del>8</del> F

(a) A channel consists of two core exit thermocouples (CETs).

3.6 CONTAINMENT SYSTEMS

3.6.7 Hydrogen Recombiners

LCO 3.6.7 Two hydrogen recombiners shall be OPERABLE.

APPLICABILITY: MODES 1 and 2.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One hydrogen recombiner inoperable.	A.1 <div style="border: 1px dashed black; padding: 5px; text-align: center;">                     - NOTE -                      LCO 3.0.4 is not applicable.                 </div> Restore hydrogen recombiner to OPERABLE status.	30 days
B. Two hydrogen recombiners inoperable.	B.1 Verify by administrative means that the hydrogen control function is maintained.	1 hour <u>AND</u> Once per 12 hours thereafter
	<u>AND</u> B.2 Restore one hydrogen recombiner to OPERABLE status.	7 days
C. Required Action and associated Completion Time not met.	C.1 Be in MODE 3.	6 hours

**SURVEILLANCE REQUIREMENTS**

SURVEILLANCE		FREQUENCY
SR 3.6.7.1	Perform a system functional check for each hydrogen recombiner.	24 months
SR 3.6.7.2	Perform CHANNEL CALIBRATION for each hydrogen recombiner actuation and control channel.	24 months

**Attachment 3**

**Revised Technical Specification Pages**

3.3 INSTRUMENTATION

3.3.3 Post Accident Monitoring (PAM) Instrumentation

LCO 3.3.3 The PAM instrumentation for each Function in Table 3.3.3-1 shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

- NOTE -

1. LCO 3.0.4 is not applicable.
2. Separate Condition entry is allowed for each Function.

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>A.</p> <p>-----</p> <p>- NOTE - Not applicable to Functions 3 and 4.</p> <p>-----</p> <p>One or more Functions with one required channel inoperable.</p>	<p>A.1</p> <p>Restore required channel to OPERABLE status.</p>	<p>30 days</p>
<p>B.</p> <p>Required Action and associated Completion Time of Condition A not met.</p>	<p>B.1</p> <p>Initiate action to prepare and submit a special report.</p>	<p>Immediately</p>
<p>C.</p> <p>-----</p> <p>- NOTE - Only applicable to Functions 3 and 4.</p> <p>-----</p> <p>One or more Functions with required channel inoperable.</p>	<p>C.1</p> <p>Restore required channel to OPERABLE status.</p>	<p>7 days</p>

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. One or more Functions with two required channels inoperable.	D.1 Restore one channel to OPERABLE status.	7 days
E. Required Action and associated Completion Time of Condition C or D not met.	E.1 Enter the Condition referenced in Table 3.3.3-1 for the channel.	Immediately
F. As required by Required Action E.1 and referenced in Table 3.3.3-1.	F.1 Be in MODE 3.	6 hours
	<u>AND</u> F.2 Be in MODE 4.	12 hours
G. As required by Required Action E.1 and referenced in Table 3.3.3-1.	G.1 Initiate action to prepare and submit a special report.	Immediately

**SURVEILLANCE REQUIREMENTS**

- NOTE -

SR 3.3.3.1 and SR 3.3.3.2 apply to each PAM instrumentation Function in Table 3.3.3-1.

SURVEILLANCE	FREQUENCY
SR 3.3.3.1 Perform CHANNEL CHECK for each required instrumentation channel that is normally energized.	31 days
SR 3.3.3.2 Perform CHANNEL CALIBRATION.	24 months

Table 3.3.3-1  
Post Accident Monitoring Instrumentation

FUNCTION	REQUIRED CHANNELS	CONDITION
1. Pressurizer Pressure	2	F
2. Pressurizer Level	2	F
3. Reactor Coolant System (RCS) Hot Leg Temperature	1 per loop	F
4. RCS Cold Leg Temperature	1 per loop	F
5. RCS Pressure (Wide Range)	2	F
6. RCS Subcooling Monitor	2	F
7. Reactor Vessel Water Level	2	G
8. Containment Sump B Water Level	2	F
9. Containment Pressure (Wide Range)	2	F
10. Containment Area Radiation (High Range)	2	G
11. Condensate Storage Tank Level	2	F
12. Refueling Water Storage Tank Level	2	F
13. Residual Heat Removal Flow	2	F
14. Core Exit Temperature-Quadrant 1	2 <sup>(a)</sup>	F
15. Core Exit Temperature-Quadrant 2	2 <sup>(a)</sup>	F
16. Core Exit Temperature-Quadrant 3	2 <sup>(a)</sup>	F
17. Core Exit Temperature-Quadrant 4	2 <sup>(a)</sup>	F
18. Auxiliary Feedwater (AFW) Flow to Steam Generator (SG) A	2	F
19. AFW Flow to SG B	2	F
20. SG A Water Level (Narrow Range)	2	F
21. SG B Water Level (Narrow Range)	2	F
22. SG A Water Level (Wide Range)	2	F

Table 3.3.3-1  
Post Accident Monitoring Instrumentation

	FUNCTION	REQUIRED CHANNELS	CONDITION
	23. SG B Water Level (Wide Range)	2	F
	24. SG A Pressure	2	F
	25. SG B Pressure	2	F

(a) A channel consists of two core exit thermocouples (CETs).

**Attachment 4**

**List of Regulatory Commitments**

### **List of Regulatory Commitments**

The following table identifies those actions committed to by R.E. Ginna Nuclear Power Plant, LLC in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

<b>REGULATORY COMMITMENT</b>	<b>DUE DATE</b>
The hydrogen monitors will be included in the Ginna Technical Requirements Manual (TRM).	This regulatory commitment will be implemented with implementation of this TS amendment.