October 19, 2004

Mrs. Mary G. Korsnick
Vice President R.E. Ginna Nuclear Power Plant
R.E. Ginna Nuclear Power Plant, LLC
1503 Lake Road
Ontario, NY 14519

SUBJECT: R. E. GINNA NUCLEAR POWER PLANT RELIEF REQUESTS VR-1, VR-2 AND VR-13 FOR THE FOURTH 10-YEAR INTERVAL OF THE PUMP AND VALVE INSERVICE TESTING PROGRAM (TAC NO. MC2393)

Dear Mrs. Korsnick:

By letter dated March 18, 2004, as supplemented July 14, 2004, you submitted revised Relief Requests VR-1, VR-2, and VR-13 requesting an alternative testing frequency for certain valves. These relief requests are related to the fourth 10-year interval inservice testing (IST) program for pumps and valves. The Ginna IST program plan for the fourth 10-year interval is based on the requirements in Section XI of the 1989 Edition of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code). For IST of valves, the ASME Code, Section XI; Subsection IWV, references the 1987 Edition through the 1988 Addenda of the Operations and Maintenance (OM) Standard, Part 10 (OM-10), "Inservice Testing of Valves in Light-Water Reactor Power Plants."

The Nuclear Regulatory Commission (NRC) staff finds your requests for relief acceptable. The proposed alternatives to the Code requirements described in VR-1, VR-2, and VR-13 are authorized pursuant to 10 CFR 50.55a(a)(3)(i) based on the alternative providing an acceptable level of quality and safety. The alternatives are authorized for the fourth 10-year interval. The NRC staff's safety evaluation is enclosed.

Sincerely,

/RA/

Richard J. Laufer, Chief, Section 1
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-244

Enclosure: Safety Evaluation

cc w/encl: See next page

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Vice President R.E. Ginna Nuclear Power Plant
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1503 Lake Road
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The Nuclear Regulatory Commission (NRC) staff finds your requests for relief acceptable. The proposed alternatives to the Code requirements described in VR-1, VR-2, and VR-13 are authorized pursuant to 10 CFR 50.55a(a)(3)(i) based on the alternative providing an acceptable level of quality and safety. The alternatives are authorized for the fourth 10-year interval. The NRC staff's safety evaluation is enclosed.

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Project Directorate I
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Docket No. 50-244

Enclosure: Safety Evaluation

cc w/encl: See next page
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cc: R.E. Ginna Nuclear Power Plant

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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELIEF REQUESTS VR-1, VR-2, AND VR-13

RELATED TO THE INSERVICE TESTING PROGRAM, FOURTH 10-YEAR INTERVAL

R. E. GINNA NUCLEAR POWER PLANT, LLC

R. E. GINNA NUCLEAR POWER PLANT

DOCKET NUMBER 50-244

1.0 INTRODUCTION

By letter dated March 18, 2004, Rochester Gas and Electric Corporation (former licensee), submitted Relief Requests VR-1, VR-2, and VR-13 requesting relief from certain inservice testing (IST) requirements for valves at the R. E. Ginna Nuclear Power Plant (Ginna). In response to the Nuclear Regulatory Commission (NRC) staff's request for additional information (RAI), the new licensee, R. E. Ginna Nuclear Power Plant, LLC, submitted a response in a letter dated July 14, 2004. These relief requests are applicable to the fourth 10-year interval IST program for Ginna. The Ginna fourth 10-year IST program interval began on January 1, 2000, and is scheduled to end December 31, 2009.

In Relief Requests VR-1 and VR-2, the licensee proposes an alternative testing frequency for performing IST of check valves. The check valves will be tested using a disassembly-and-inspection method on a frequency of at least once during each operating cycle, in lieu of once during each refueling outage, as currently required by American Society of Mechanical Engineers/American National Standards Institute, Operations and Maintenance Standards Part 10 (ASME/ANSI OM-10) paragraphs 4.3.2.2(e) and 4.3.2.4(c).

In Relief Request VR-13, the licensee proposes an alternative testing frequency for performing IST of active Category A and B manual valves in various systems in lieu of the OM-10, paragraph 4.2.1.1 requirements, provided that adverse conditions, as defined in the OM standard, do not require more frequent testing. The manual valves will be exercised every 2 years in lieu of every quarter (3 months).

2.0 REGULATORY EVALUATION

Title 10 of the *Code of Federal Regulations*, 10 CFR 50.55a, requires that IST of certain ASME Code Class 1, 2, and 3 pumps and valves be performed in accordance with Section XI of the ASME Code and applicable addenda, except where alternatives have been authorized or relief has been requested by the licensee and granted by the Commission pursuant to paragraphs (a)(3)(i), (a)(3)(ii), or (f)(6)(i) of 10 CFR 50.55a. In proposing alternatives or requesting relief,

the licensee must demonstrate that: (1) the proposed alternatives provide an acceptable level of quality and safety; (2) compliance would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety; or (3) conformance is impractical for its facility. Section 50.55a authorizes the Commission to approve alternatives and to grant relief from ASME Code requirements upon making the necessary findings. NRC guidance contained in Generic Letter (GL) 89-04, "Guidance on Developing Acceptable Inservice Testing Programs," provides alternatives to the Code requirements which are acceptable. Further guidance is given in GL 89-04, Supplement 1, and NUREG-1482, "Guidelines for Inservice Testing at Nuclear Power Plants." The fourth 10-year IST interval for Ginna Station began on January 1, 2000, and is scheduled to end December 31, 2009. The IST program was developed in accordance with the requirements of the 1989 Edition of the ASME Code by implementation of the 1987 ASME/ANSI *Operations and Maintenance (OM) Standards* Part 1, Part 6, and Part 10 (OM-1, OM-6, and OM-10) for IST of safety and relief devices, pumps, and valves, respectively.

3.0 TECHNICAL EVALUATION

The licensee's regulatory and technical analyses in support of its request for relief from ASME Code IST requirements are described in the licensee's submittal dated March 18, 2004, and RAI response dated July 14, 2004. A description of the relief request and the staff's evaluation follows.

3.1 Relief Request VR-1, Revision 1

The licensee requests relief from the testing requirements of OM-10, paragraph 4.3.2.1 which states that check valves shall be exercised at least once every 3 months except as provided by paragraphs 4.3.2.2, 4.3.2.3, 4.3.2.4, and 4.3.2.5. Paragraph 4.3.2.4(c) states that disassembly every refueling outage may be used to verify valve operability. The licensee proposes an alternative to establish a check valve sample disassembly and inspection plan for the two valves in the emergency diesel generator fuel oil system. This alternative was previously approved for the licensee's fourth 10-year interval in the staff's safety evaluation (SE) dated May 5, 2000. Now in VR-1, Revision 1, the licensee requests to disassemble, manually stroke exercise and inspect one check valve on a rotating frequency for each operating cycle in lieu of during each refueling outage.

3.1.1 Licensee's Basis for Requesting Relief

The licensee states:

> Relief is requested to disassemble, manually full stroke exercise and inspect one check valve on a rotating basis, at a frequency of each operating cycle in lieu of during each refueling outage. This is to allow the surveillance requirement to be met with the plant online. The following underscore the usefulness and applicability of an online testing approach:
>
> 1. The design of the system is such that either emergency diesel generator can be isolated and the check valve disassembled with the plant online.

2. Performing the inspection with the plant online reduces outage complexity.

3. The check valves are located in an area where performance of the disassembly coupled with other major outage work increases the potential development of error-likely situations in work control and reassembly process.

4. The check valve disassembly and inspection activities can be completed within 50% or less of the associated system Technical Specification allowed outage time.

5. An acceptable testing frequency can be maintained separately without being tied to the refueling outage. Inservice testing on a frequency that maintains the acceptable time period between testing activities during the operating cycle is consistent with the intent of OM-10 and GL 89-04.

6. The number of tests to be performed using either the outage or online frequency statements should be approximately equivalent. Thus, an equivalent level of quality and safety is maintained.

In response to the NRC staff's RAI, the licensee submitted a response in a letter dated July 14, 2004, which also states that as part of the 1996 conversion of Ginna Technical Specifications (TSs) to the format of NUREG-1431, Ginna was evaluated and approved for nominal 24-month surveillance intervals. Though the current nominal cycle length is 18 months.

3.1.2 Alternative Testing

The licensee proposes:

> One valve will be disassembled, manually full-stroke exercised and inspected once each operating cycle on a rotating basis. If that valve fails, the remaining valve will be disassembled, full-stroke exercised and inspected for operability at that same time. (re: Generic Letter 89-04, Attachment 1 - Position 2)

3.1.3 Evaluation

The check valves for which the licensee requests relief are 5960A and 5960B, which open to provide a flow path for overflow from the fuel oil day tank to the fuel oil storage tank. These valves close to prevent reverse flow into the fuel oil day tank during recirculation of the fuel oil storage tank. The Code, OM-10 paragraph 4.3.2.1, requires that check valves be exercised at least once every 3 months except as provided by paragraphs 4.3.2.2, 4.3.2.3, 4.3.2.4, and 4.3.2.5. As an alternative to demonstrating valve obturator movement, the Code allows disassembly every refueling outage to determine operability of the valves (OM-10, paragraph 4.3.2.4(c)). The licensee proposes to disassemble and inspect one check valve on rotating frequency of each operating cycle in lieu of during each refueling outage. The valve tested will alternate every operating cycle.

The staff Position 2 of GL 89-04 allows for the employment of a sample disassembly and inspection plan for groups of identical valves in similar applications. The sample disassembly

and inspection plan involves grouping similar valves and testing one valve in each group during each refueling outage. Guidelines for this plan are stated in Appendix A of NUREG-1482. The sampling technique requires that each valve in the group be the same design and have the same service conditions, including valve orientation. Additionally, at each disassembly, the licensee must verify that the disassembled valve is capable of full stroking and that the internals of the valve are structurally sound. Also, if the disassembly is to verify the full-stroke capability of the valve, the disk should be manually exercised.

A different valve in the group is required to be disassembled, inspected, and manually full-stroke exercised at each successive refueling outage until the entire group has been tested. If the disassembled valve is not capable of being full-stroke exercised or there is binding or failure of the valve internals, the remaining valves in that group must also be disassembled, inspected, and manually full-stroke exercised during the same outage. Once this is complete, the sequence of disassembly is repeated.

In Relief Request VR-1, Revision 0, the licensee proposed an alternative to establish a check valve sample disassembly and inspection plan for the two valves in the emergency diesel generator fuel oil system during each refueling outage, which was previously authorized for the licensee's fourth 10-year interval. Now in VR-1, Revision 1, the licensee requests to disassemble, manually stroke exercise and inspect one check valve on rotating frequency of each operating cycle in lieu of during each refueling outage.

The NRC staff finds that disassembly and inspection of the emergency diesel generator fuel oil system check valves 5960A and 5960B are appropriate to verify operability and can be accomplished during system outage when the plant is online. The NRC staff's finding is based on the following considerations:

1. IST performed on a refueling outage frequency meets the guidelines of Position 2 in GL 89-04. By specifying testing activities on a frequency commensurate with each refueling outage, the ASME Code recognizes and establishes an acceptable time period between testing. The refueling outages have provided a practical and definitive time period in which testing activities can be safely and effectively performed. An acceptable testing frequency can be maintained separately without being tied directly to a refueling outage. IST performed on a frequency (18 months or 24 months) that maintains the acceptable time period between testing activities during the operating cycle (i.e., 18 months or 24 months) is consistent with the intent of the GL-89-04.

2. Over time, approximately the same number of tests will be performed using the proposed operating cycle test frequency as would be performed using the current refueling outage frequency. Thus, IST activities performed during the proposed operating cycle (i.e., 18 months or 24 months) test frequency provide an equivalent level of quality and safety as IST performed at a refueling outage frequency.

3. The check valves 5960A and 5960B are located in the overflow line from the respective diesel fuel oil day tank to the underground main storage tank. There are no isolation valves in the flow path. The diesel generator and fuel oil transfer pump will be isolated at the time of check valve 5960A or 5960B disassembly and inspection. The check valves line is normally drained.

4. The licensee states that there is no increase in risk due to the fact that disassembly and inspection of the check valve(s) will be performed during a scheduled maintenance outage of the diesel generator, when it is out of service. The existing Ginna Station TS for the diesel generator, LCO 3.8.1, provides for a 7-day allowed outage time. The check valve disassembly and inspection activities can be completed within this time with ample margin to complete disassembly and inspection activities in an orderly manner.

5. There are no technical barriers to performing these IST activities during either the refueling outage or the operating cycle.

On the basis of these considerations, the NRC staff finds that the proposed alternative provides an acceptable level of quality and safety.

3.1.4 Conclusion

Based on the review of the information provided in the Relief Request VR-1, the NRC staff concludes that the licensee's proposed alternative provides an acceptable level of quality and safety. Therefore, the proposed alternative to disassemble and inspect check valves 5960A or 5960B once every operating cycle in lieu of once during each refueling outage is authorized pursuant to 10 CFR 50.55a(a)(3)(i) for the fourth 10-year interval IST Program.

Also, the licensee may perform disassembly and inspection of these check valves once during each operating cycle (18 months or 24 months depending on the nominal operating cycle length) in lieu of once during each refueling outage, without the need for further authorization. Please note that the licensee may not use an IST surveillance interval of 24 months if the current nominal operating cycle length is 18 months.

3.2 Relief Request VR-2

The licensee requests relief from the testing requirements of OM-10, paragraph 4.3.2.1 which states that check valves shall be exercised at least once every 3 months except as provided by paragraphs 4.3.2.2, 4.3.2.3, 4.3.2.4, and 4.3.2.5. Paragraph 4.3.2.4(c) states that disassembly every refueling outage may be used to verify valve operability. The licensee proposes an alternative to establish a check valve sample disassembly and inspection plan for two valves in the standby auxiliary feedwater (AFW) system. This alternative was previously approved for the licensee's fourth 10-year interval in the staff's SE dated May 5, 2000. Now, in VR-2, Revision 1, the licensee requests to disassemble, manually stroke exercise and inspect one check valve on a rotating frequency of each operating cycle in lieu of during each refueling outage.

3.2.1 Licensee's Basis for Requesting Relief

The licensee states:

> Relief is requested to disassemble, manually full stroke exercise and inspect one check valve on a rotating basis, at a frequency of each operating cycle in lieu of during each refueling outage. This is to allow the surveillance requirement to be met with the

plant online. The following underscore the usefulness and applicability of an online testing approach:

1. The design of the system is such that either Standby Auxiliary Feedwater pump can be isolated and the check valve disassembled with the plant online.

2. Performing the inspection with the plant online reduces outage complexity.

3. The check valves are located in an area where performance of the disassembly coupled with other major outage work increases the potential development of error-likely situations in work control and reassembly processes.

4. The check valves disassembly and inspection activities can be completed within 50% or less of the associated system Technical Specification allowed outage time.

5. An acceptable testing frequency can be maintained separately without being tied to the refueling outage. Inservice testing on a frequency that maintains the acceptable time period between testing activities during the operating cycle is consistent with the intent of OM-10 and GL 89-04.

6. The number of tests to be performed using either the outage or online frequency statements should be approximately equivalent. Thus, an equivalent level of quality and safety is maintained.

In response to the NRC staff's RAI, the licensee submitted a response in a letter dated July 14, 2004, which also states that as part of the 1996 conversion of Ginna TSs to the format of NUREG-1431, Ginna was evaluated and approved for nominal 24-month surveillance intervals. Though the current nominal cycle length is 18 months.

3.2.2 Alternative Testing

The licensee proposes:

> Partial stroke exercising will be performed each quarter. One valve will be disassembled, manually full-stroke exercised and inspected each operating cycle on a rotating basis. If that valve fails, the remaining valve will be disassembled, full-stroke exercised and inspected for operability at that same time. (re. Generic Letter 89-04 - Position 2).

3.2.3 Evaluation

The valves for which the licensee requests relief are 9627A and 9627B, which function as service water suction check valves. These valves close to prevent reverse flow from the standby AFW system piping back into the service water system and open to provide a flow path for service water to the standby AFW system pumps. The ASME Code, OM-10, paragraph 4.3.2.1, requires that check valves be exercised at least once every 3 months except as provided by paragraphs 4.3.2.2, 4.3.2.3, 4.3.2.4, and 4.3.2.5. As an alternative to demonstrating valve obturator movement, the Code allows disassembly every refueling outage

to determine operability of the valves (OM-10, paragraph 4.3.2.4(c)). The licensee proposes to partial-stroke exercise both valves quarterly and also disassemble and inspect one of the two valves every refueling outage. The valve tested will alternate every refueling outage.

The NRC staff's Position 2 of GL 89-04 allows for the employment of a sample disassembly and inspection plan for groups of identical valves in similar applications. The sample disassembly and inspection plan involves grouping similar valves and testing one valve in each group during each refueling outage. Guidelines for this plan are stated in Appendix A of NUREG-1482. The sampling technique requires that each valve in the group be the same design and have the same service conditions, including valve orientation. Additionally, at each disassembly, the licensee must verify that the disassembled valve is capable of full stroking and that the internals of the valve are structurally sound. Also, if the disassembly is to verify the full-stroke capability of the valve, the disk should be manually exercised.

A different valve in the group is required to be disassembled, inspected, and manually full-stroke exercised at each successive refueling outage until the entire group has been tested. If the disassembled valve is not capable of being full-stroke exercised or there is binding or failure of the valve internals, the remaining valves in that group must also be disassembled, inspected, and manually full-stroke exercised during the same outage. Once this is complete, the sequence of disassembly is repeated.

In Relief Request VR-2, Revision 0, the licensee proposed an alternative to establish a check valve sample disassembly and inspection plan for two valves in the standby AFW system, which was previously authorized for the licensee's fourth 10-year interval. Now, in VR-2, Revision 1, the licensee requests to disassemble, manually stroke exercise and inspect one check valve on a rotating frequency of each operating cycle in lieu of during each refueling outage.

The NRC staff finds that disassembly and inspection of the standby AFW system check valves 9627A and 9627B are appropriate to verify operability and can be accomplished during system outage when the plant is online. The NRC staff's findings is based on the following considerations:

1. IST performed on a refueling outage frequency meets the requirements of Position 2 in GL 89-04. By specifying testing activities on a frequency commensurate with each refueling outage, the ASME OM Code recognizes and establishes an acceptable time period between testing. The refueling outages have provided a practical and definitive time period in which testing activities can be safely and effectively performed. An acceptable testing frequency can be maintained separately without being tied directly to a refueling outage. IST performed on a frequency (24 months or 18 months) that maintains the acceptable time period between testing activities during the operating cycle (i.e., 24 months or 18 months) is consistent with the intent of GL-89-04.

2. Over time, approximately the same number of tests will be performed using the proposed operating cycle test frequency as would be performed using the current refueling outage frequency. Thus, IST activities performed during the proposed operating cycle (i.e., 24 months or 18 months) test frequency provide an equivalent level of quality and safety as IST performed at a refueling outage frequency.

3. The check valves 9627A and 9627B are located in the service water line to the standby AFW pumps. There are five sources of safety-related auxiliary water including: two motor driven feedwater pumps, one turbine driven pump, and two standby AFW pumps. Only one train of the standby AFW pump trains will be isolated at the time that valve inspection and disassembly take place. On the service water side, isolation will be performed by the 4-inch insolation valves 9626A and 9626B. There is no difference in isolation, regardless of the plant status.

4. The licensee states that the draining of the lines for valves inspection and disassembly is accomplished through local manual drain and vent valves, such that there is a positive and controlled means of determining the status of the isolation boundary. The isolation valves provide sufficient isolation of the affected Standby AFW train from in-service system.

5. There are no technical barriers to performing these IST activities during either the refueling outage or the operating cycle.

6. The licensee states that there is no increase in risk due to the fact that disassembly and inspection of the check valve(s) will be performed during a scheduled maintenance outage of the one Standby AFW train, when it is out of service. The existing Ginna TSs for the standby AFW trains, limiting condition for operation (LCO) 3.7.5, provides for a 14-day outage time. The check valve disassembly and inspection can easily be performed within this time window.

7. The service water check valves 9627A and 9627B will be partial stroke exercised each quarter.

On the basis of these considerations, the NRC staff finds that the proposed alternative provides an acceptable level of quality and safety.

3.2.4 Conclusion

Based on the review of the information provided in Relief Request VR-2, the NRC staff concludes that licensee's proposed alternative provides an acceptable level of quality and safety. Therefore, the proposed alternative to disassemble and inspect the check valves 9627A or 9627B once every operating cycle in lieu of once during each refueling outage is authorized pursuant to 10 CFR 50.55a(a)(3)(i) for the fourth 10-year interval IST Program.

Also, the licensee may perform disassembly and inspection of these check valves once during each operating cycle (18 months or 24 months depending on the nominal operating cycle length) in lieu of once during each refueling outage, without the need for further authorization. Please note that the licensee may not use an IST surveillance interval of 24 months if the current nominal operating cycle length is 18 months.

3.3 Relief Request VR-13

The licensee has requested relief for active Category A and B, safety Class 2 and 3 manual valves in various systems from the test requirements as defined in paragraph 4.2.1.1 of OM-10, 1988 Addenda to OM-1987. OM-10, paragraph 4.2.1.1, "Exercising Test Frequency," requires

that active Category A and B valves be tested nominally every 3 months, except as provided by paragraphs 4.2.1.2, 4.2.1.5, and 4.2.1.7 of OM-10.

3.3.1 Licensee's Basis for Requesting Relief

The licensee states:

> The extension for exercising manual valves from every quarter to every 5 years has been evaluated by the OM Code committee, found acceptable, and incorporated into the 1999 Addenda and 2000 Addenda of the OM code. The USNRC stated the following for 10 CFR 50.55(a) in the Federal Register/Vol. 67, Number 187, dated September 26, 2002:
>
> (vi) Exercise interval for manual valves. Manual valves must be exercised on a 2-year interval rather than the 5-year interval specified in paragraph ISTC-3540 of the 1999 Addenda through the latest edition and addenda incorporated by reference in paragraph (b)(3) of this section, provided that adverse conditions do not require more frequent testing.

3.3.2 Alternative Testing

The licensee proposes:

The active Category A and B, and safety Class 2 and 3 manual valves in various systems will have an exercise interval of 2 years, provided that adverse conditions, as defined in the OM Code, do not require more frequent testing.

3.3.3 Evaluation

The Code requires that Category A and B valves be tested nominally every 3 months, except as provided by paragraphs 4.2.1.2, 4.2.1.5, and 4.2.1.7 of OM-10.

In the current 10 CFR 50.55a(b)(3)(vi), "Exercise interval for manual valves" states that manual valves must be exercised on a 2-year interval rather than the 5-year interval specified in paragraph ISTC-3540 of the 1999 Addenda through the latest edition and addenda incorporated by reference in paragraph (b)(3) of this section, provided that adverse conditions do not require more frequent testing.

The licensee's proposed alternative provides a frequency of once every 2 years for manual valves to ensure operational readiness and meets the modification as required in 10 CFR 50.55a(b)(3)(vi). Therefore, the licensee's alternative provides an acceptable level of quality and safety.

3.3.4 Conclusion

The NRC staff concludes that the licensee's proposed alternative to the exercise frequency requirements of ISTC 4.2.1.1 (OM-10, 1987 Edition, including 1988 Addenda) for manual valves is authorized pursuant to 10 CFR 50.55a(a)(3)(i) on the basis that the alternative provides an acceptable level of quality and safety.

4.0 CONCLUSION

The proposed alternatives to the Code requirements described in VR-1, VR-2, and VR-13 are authorized pursuant to 10 CFR 50.55a(a)(3)(i) based on the alternatives providing an acceptable level of quality and safety. The alternatives are authorized for the fourth 10-year interval.

5.0 REFERENCES

U.S. Code of Federal Regulations, "Domestic Licensing of Production and Utilization Facilities," Part 50, Chapter I, Title 10, Energy, Section 50.55a, Codes and standards.

U.S. Nuclear Regulatory Commission, "Guidance on Developing Acceptable Inservice Testing Program," Generic Letter 89-04, through Supplement 1, April 4, 1995.

U.S. Nuclear Regulatory Commission, "Guidance for Inservice Testing at Nuclear Power Plants," NUREG-1482, April 1995.

Letter from Robert C. Mecredy, Nuclear Operations, Rochester Gas & Electric Corporation, to NRC "Submittal of Relief Requests VR-1, VR-2 and VR-13 Related to the Requirements of 10 CFR 50.55a(f), Inservice testing requirements - Fourth Interval Inservice Testing Program," for R. E. Ginna, Docket No. 50-244, March 18, 2004.

Letter from Mary G. Korsnick, Constellation Energy, to USNRC, "Response to Request for Additional Information Regarding R. E. Ginna Nuclear Plant Relief Requests VR-1, VR-2 and VR-13," for Rochester Gas & Electric, Ginna Nuclear Power Plant, Docket No. 50-244, July 14, 2004.

Principal Contributor: G. S. Bedi

Date: October 19, 2004