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Constellation Energy
R.E. Ginna Nuclear Power Plant

January 27, 2005

Ms. Donna M. Skay
Office of Nuclear Regulatory Regulation
U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555-0001

Subject: Addendum to License Amendment Request Regarding Control Room Emergency Air Treatment System (CREATS) Modification.
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

References: 1. Letter from Robert C. Mecredy (RG&E) to Robert L. Clark (NRC), dated September 30, 2003, "Summary of Public Meeting Between RG&E and NRC Staff Held on August 19, 2003."

2. Letter from Joseph A. Widay (Ginna) to Robert L. Clark (NRC) dated December 3, 2004, "Response to Request for Additional Information (RAI) dated November 9, 2004, Regarding the Proposed Control Room Emergency Air Treatment System (CREATS) Modification."

3. Letter from Joseph A. Widay (Ginna) to Robert L. Clark (NRC) dated December 6, 2004, "Addendum to License Amendment Request, dated March 1, 2004."

Dear Ms. Skay:

On September 30, 2003, Ginna submitted Reference 1 including a commitment to provide CREATS system pressure drop information for Technical Specification 5.5.10.b, Item 1, after initial startup testing of the new system. This information has recently been determined, and is included in Attachment 1.

On the indicated dates for References 2 and 3, Ginna submitted information related to the Control Room Emergency Air Treatment System (CREATS) modification. Subsequent to those submittals, discussions with you and your staff resulted in minor changes and clarifications to proposed Technical Specification sections 3.3.6 (Table 1), 3.7.9, and 5.5.10.b. Attachment 1 to this letter reflects those agreed upon changes. Per your request, only the affected pages are included. This submittal contains no new commitments.

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If you have any questions regarding this submittal, please contact Mr. Mike Ruby at (585) 771-3572.

Very truly yours,

Mary G. Korsnick

Mary G. Korsnick

STATE OF NEW YORK :
: **TO WIT:**
COUNTY OF WAYNE :

I, Mary G. Korsnick, being duly sworn, state that I am Vice President – R.E. Ginna Nuclear Power Plant, LLC (Ginna LLC), and that I am duly authorized to execute and file this response on behalf of Ginna LLC. To the best of my knowledge and belief, the statements contained in this document are true and correct. To the extent that these statements are not based on my personal knowledge, they are based upon information provided by other Ginna LLC employees and/or consultants. Such information has been reviewed in accordance with company practice and I believe it to be reliable.

Mary G. Korsnick

Subscribed and sworn before me, a Notary Public in and for the State of New York and County of MONROE, this 27 day of January, 2005.

WITNESS my Hand and Notarial Seal:

Sharon L Miller
Notary Public

SHARON L. MILLER
Notary Public, State of New York
Registration No. 01MI6017755
Monroe County
Commission Expires December 21, 2006

My Commission Expires:

12-21-06
Date

Attachments:

1. Revised pages

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Attachment 1

Revised Submittal

Section 3.3.6 - Correct minor typographical error in Table 3.3.6-1

Section 3.7.9 - Remove Core Alteration Applicability for consistency with Westinghouse Owners Group (WOG) Standard Tech Specs, NUREG 1431. This is consistent with our March 3, 2004 submittal.

Section 5.5.10.b.1 - Provide new value, per commitment in Reference 1.

Section 5.5.10.b.4 – Provide new and revised values, per discussion with NRC staff and interpolation of values in Regulatory Guide 1.52, Revision 3, Table 1.

Table 3.3.6-1
CREATS Actuation Instrumentation

	FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	SURVEILLANCE REQUIREMENTS	LIMITING SAFETY SYSTEM SETTINGS[a]
1.	Manual Initiation	1, 2, 3, 4, (b)	2 trains	SR 3.3.6.3	NA
2.	Automatic Actuation Logic and Actuation Relays	1, 2, 3, 4, (b)	2 trains	SR 3.3.6.5	NA
3.	Control Room Radiation Intake Monitors	1, 2, 3, 4, (b)	2	SR 3.3.6.1 SR 3.3.6.2 SR 3.3.6.4	≤ .57 mR/hr
4.	Safety Injection	Refer to LCO 3.3.2, "ESFAS Instrumentation," Function 1, for all initiation functions and requirements.			

(a) A channel is OPERABLE when both of the following conditions are met:

1. The absolute difference between the as-found Trip Setpoint (TSP) and the previous as-left TSP is within the COT Acceptance Criteria. The COT Acceptance Criteria is defined as:

   |as-found TSP - previous as-left TSP| ≤ COT uncertainty

   The COT uncertainty shall not include the calibration tolerance.

2. The as-left TSP is within the established calibration tolerance band about the nominal TSP. The nominal TSP is the desired setting and shall not exceed the Limiting Safety System Setting (LSSS). The LSSS, COT uncertainty, and the established calibration tolerance band are defined in accordance with the Ginna instrument setpoint methodology. The channel is considered operable even if the as-left TSP is non-conservative with respect to the LSSS provided that the as-left TSP is within the established calibration tolerance band.

(b) During movement of irradiated fuel assemblies

3.7 PLANT SYSTEMS

3.7.9 Control Room Emergency Air Treatment System (CREATS)

LCO 3.7.9 Two CREATS Trains shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4,
During movement of irradiated fuel assemblies.

ACTIONS

CONDITION		REQUIRED ACTION		COMPLETION TIME
A.	One CREATS train inoperable.	A.1	Restore CREATS train to OPERABLE status.	7 days
B.	Required Action and associated Completion Time of Condition A not met in MODE 1, 2, 3, or 4.	B.1 AND B.2	Be in MODE 3. Be in MODE 5.	6 hours 36 hours
C.	Required Action and associated Completion Time of Condition A not met during movement of irradiated fuel assemblies.	C.1	Suspend movement of irradiated fuel assemblies.	Immediately
D.	Two CREATS trains inoperable in MODE 1, 2, 3, or 4.	D.1	Enter LCO 3.0.3.	Immediately
E.	Two CREATS trains inoperable during movement of irradiated fuel assemblies.	E.1	Suspend movement of irradiated fuel assemblies.	Immediately

SURVEILLANCE REQUIREMENTS

	SURVEILLANCE	FREQUENCY
SR 3.7.9.1	Operate each CREATS filtration train ≥ 15 minutes.	31 days
SR 3.7.9.2	Perform required CREATS filter testing in accordance with the Ventilation Filter Testing Program (VFTP).	In accordance with VFTP
SR 3.7.9.3	Verify each CREATS train actuates on an actual or simulated actuation signal.	24 months

b. Control Room Emergency Air Treatment System (CREATS)

1. Demonstrate the pressure drop across the combined HEPA filters, the prefilters, the charcoal adsorbers and the post-filters is < 11 inches of water at a design flow rate (± 10%).

2. Demonstrate that an in-place DOP test of the HEPA filter bank shows a penetration and system bypass < 0.05%.

3. Demonstrate that an in-place Freon test of the charcoal adsorber bank shows a penetration and system bypass < 0.05%, when tested under ambient conditions.

4. Demonstrate that a laboratory test of a sample of the charcoal adsorber, when obtained as described in Regulatory Guide 1.52, Revision 2, shows a methyl iodide penetration of less than 1.5% when tested in accordance with ASTM D3803-1989 at a test temperature of 30°C (86°F), a relative humidity of 95%, and a face velocity of 61 ft/min.

c. SFP Charcoal Adsorber System

1. Demonstrate that the total air flow rate from the charcoal adsorbers shows at least 75% of that measured with a complete set of new adsorbers.

2. Demonstrate that an in-place Freon test of the charcoal adsorbers bank shows a penetration and system bypass < 1.0%, when tested under ambient conditions.

3. Demonstrate that a laboratory test of a sample of the charcoal adsorber, when obtained as described in Regulatory Guide 1.52, Revision 2, shows a methyl iodide penetration of less than 14.5% when tested in accordance with ASTM D3803-1989 at a test temperature of 30°C (86°F) and a relative humidity of 95%.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the VFTP frequencies.

5.5.11 Explosive Gas and Storage Tank Radioactivity Monitoring Program

This program provides controls for potentially explosive gas mixtures contained in the waste gas decay tanks and the quantity of radioactivity contained in waste gas decay tanks. The gaseous radioactivity quantities shall be determined following the methodology in NU REG-0133.

The program shall include: