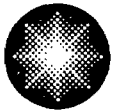


**Maria Korsnick**  
Vice President

1503 Lake Road  
Ontario, New York 14519-9364  
585.771.3494  
585.771.3943 Fax  
maria.korsnick@constellation.com



## **Constellation Energy**

R.E. Ginna Nuclear Power Plant

March 7, 2005

Ms. Donna M. Skay  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
11555 Rockville Pike  
Rockville, MD 20852

**Subject:** 90 Day Response to NRC Generic Letter 2004-02, Potential Impact of Debris Blockage on Emergency Recirculation during Design Basis Accidents at Pressurized-Water Reactors  
R.E. Ginna Nuclear Power Plant  
Docket No. 50-244

**Reference:** NRC Generic Letter 2004-02: Potential Impact of Debris Blockage on Emergency Recirculation during Design Basis Accidents at Pressurized-Water Reactors, dated September 13, 2004.

Dear Ms. Skay:

The purpose of this letter is to forward the R.E. Ginna Nuclear Power Plant, LLC (Ginna LLC) 90 day response to Nuclear Regulatory Commission (NRC) Generic Letter 2004-02. The Generic Letter was issued to request evaluation of the Emergency Core Cooling System (ECCS) and Containment Spray System (CSS) recirculation functions and, if appropriate, take additional actions to ensure system function. The request is based on the identified potential susceptibility of pressurized-water reactor (PWR) recirculation sump screens to debris blockage during design basis accidents.

### NRC Requested Information

*Within 90 days of the date of the safety evaluation report providing the guidance for performing the requested evaluation, addressees are requested to provide information regarding their planned actions and schedule to complete the requested evaluation. The information should include the following:*

- 1. A description of the methodology that is used or will be used to analyze the susceptibility of the ECCS and CSS recirculation functions for your reactor to the adverse effects identified in this generic letter of post-accident debris blockage and operation with debris-laden fluids identified in this generic letter. Provide the completion date of the analysis that will be performed.*

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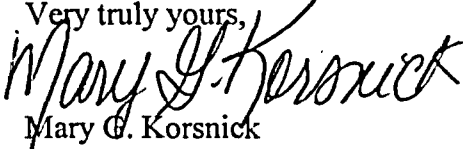
2. *A statement of whether you plan to perform a containment walkdown surveillance in support of the analysis of the susceptibility of the ECCS and CSS recirculation functions to the adverse effects of debris blockage identified in this generic letter. Provide justification if no containment walkdown surveillance will be performed. If a containment walkdown surveillance will be performed, state the planned methodology to be used and the planned completion date.*

Ginna LLC Response

Ginna LLC is in the process of analyzing the susceptibility of ECCS and CSS recirculation functions to the adverse effects of post-accident debris blockage and operation with debris-laden fluids identified in Generic Letter 2004-02, utilizing the intent of industry guidance document NEI 04-07, "Pressurized-Water Reactor (PWR) Sump Performance Methodology," dated May 28, 2004. The current licensing basis for R.E. Ginna, as well as plant specific features may identify exceptions and or refinements which may be taken to the guidance given in NEI 04-07. The analysis and exceptions or refinements to the guidance given in NEI 04-07, should they be taken, will be identified and a basis for them documented in the response to item 2 of the Generic Letter requested information, scheduled for NRC submittal by September 1, 2005. That response will provide a plant specific evaluation of debris generation, the development of a computational fluid dynamics (CFD) model of containment to determine sump fluid velocity profiles, debris transport to the ECCS recirculation sump screen, the head loss associated with debris accumulation, and its associated effect on available NPSH.

Containment walkdowns have been performed at Ginna in support of the CFD analysis of the susceptibility of the ECCS and CSS recirculation functions to the adverse effects of debris blockage identified in the Generic Letter. Additional walkdowns will be performed during the March 2005 outage using the guidance provided in NEI 02-01, "Condition Assessment Guidelines, Debris Sources inside Containment," Revision 1, which will include sampling for latent debris using guidance in NEI 04-07 and the NRC SER.

Any questions concerning this submittal should be directed to Thomas Harding, Nuclear Safety and Licensing at (585) 771-3384.

Very truly yours,  
  
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 7 day of March, 2005.

WITNESS my Hand and Notarial Seal:

Sharon L. Miller  
Notary Public

My Commission Expires:

12-21-06  
Date

SHARON L. MILLER  
Notary Public, State of New York  
Registration No. 01M6017755  
Monroe County  
Commission Expires December 21, 2006

xc: Ms. Donna M. Skay (Mail Stop O-8-C2)  
Project Directorate I  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
One White Flint North  
11555 Rockville Pike  
Rockville, MD 20852

Regional Administrator, Region I  
U.S. Nuclear Regulatory Commission  
475 Allendale Road  
King of Prussia, PA 19406

U.S. NRC Ginna Senior Resident Inspector

Mr. Carey W. Fleming  
Sr. Counsel - Nuclear Generation  
Constellation Generation Group, LLC  
750 E. Pratt Street, 17th Floor  
Baltimore, MD 21202

Mr. Peter R. Smith  
New York State Energy, Research,  
and Development Authority  
17 Columbia Circle  
Albany, NY 12203-6399

Mr. Paul D. Eddy  
Electric Division  
NYS Department of Public Service  
3 Empire State Plaza, 10th Floor  
Albany, NY 12223