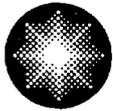


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## **Constellation Energy**

R.E. Ginna Nuclear Power Plant

March 10, 2005

Ms. Donna M. Skay  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555

**Subject:** Replacement Pages Associated with the Application for Amendment to Facility Operating License Revision to Diesel Fuel Oil Requirements  
R.E. Ginna Nuclear Power Plant  
Docket No. 50-244

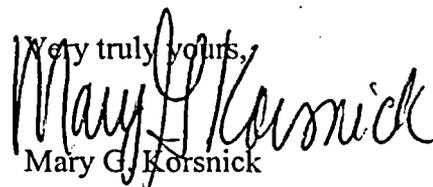
**Reference:** (a) Letter from Mary G. Korsnick (Ginna LLC) to Robert L. Clark (NRC), "Application for Amendment to Facility Operating License Revision to Diesel Fuel Oil Requirements", dated December 20, 2004.

(b) Letter from Donna M. Skay (NRC) to Mary G. Korsnick (Ginna LLC), "R. E. Ginna Nuclear Power Plant - Amendment Re: Modification of the Control Room Emergency Air Treatment System and Change to Dose Calculation Methodology to Alternate Source Term (TAC NO. MB9123)", dated February 25, 2005.

Dear Ms. Skay:

In Reference (a), R.E. Ginna Nuclear Power Plant, LLC (Ginna LLC) submitted a proposed change to the Improved Technical Specifications associated with the surveillance requirements to establish and verify the acceptability of new diesel fuel oil for use. Subsequent to the submittal, as the result of Amendment No. 87 to the R.E. Ginna Nuclear Power Plant Facility Operating Report (Reference (b)), the proposed revised Improved Technical Specification pages of Enclosure 3 of Reference (a) have been amended. Attached are the replacement pages for Enclosure 3 of Reference (a).

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

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Revised Enclosure 3. Revised Technical Specification Pages

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**Enclosure 3**  
**R.E. Ginna Nuclear Power Plant**  
**Revised Technical Specification Pages**

5.0 ADMINISTRATIVE CONTROLS

5.5 Programs and Manuals

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The following programs and manuals shall be established, implemented, and maintained.

5.5.1 Offsite Dose Calculation Manual (ODCM)

The ODCM shall contain:

- a. The methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm and trip setpoints, and in the conduct of the radiological environmental monitoring program; and
- b. The radioactive effluent controls and radiological environmental monitoring activities and descriptions of the information that should be included in the Annual Radiological Environmental Operating and Radioactive Effluent Release Reports.

Licensee initiated changes to the ODCM:

- a. Shall be documented and records of reviews performed shall be retained. This documentation shall contain:
  1. sufficient information to support the change(s) together with the appropriate analyses or evaluations justifying the change(s),
  2. a determination that the change(s) maintain the levels of radioactive effluent control required by 10 CFR 20.1302, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I, and does not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations;
- b. Shall become effective after review and acceptance by the onsite review function and the approval of the plant manager; and
- c. Shall be submitted to the NRC in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Radioactive Effluent Release Report for the period of the report in which any change in the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (i.e., month and year) the change was implemented.

5.5.2

Primary Coolant Sources Outside Containment Program

This program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident. The systems include Containment Spray, Safety Injection, and Residual Heat Removal in the recirculation configuration. The program shall include the following:

- a. Preventive maintenance and periodic visual inspection requirements; and
- b. Integrated leak test requirements for each system at refueling cycle intervals or less.

5.5.3

Deleted

5.5.4

Radioactive Effluent Controls Program

This program conforms to 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to members of the public from radioactive effluents as low as reasonably achievable. The program shall be contained in the ODCM, shall be implemented by procedures, and shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

- a. Limitations on the functional capability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM;
- b. Limitations on the concentrations of radioactive material released in liquid effluents to unrestricted areas, conforming to ten times the concentration values in 10 CFR 20, Appendix B, Table 2, Column 2;
- c. Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.1302 and with the methodology and parameters in the ODCM;
- d. Limitations on the annual and quarterly doses or dose commitment to a member of the public from radioactive materials in liquid effluents released from the plant to unrestricted areas, conforming to 10 CFR 50, Appendix I and 40 CFR 141;
- e. Determination of cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days;

- f. Limitations on the functional capability and use of the liquid and gaseous effluent treatment systems to ensure that appropriate portions of these systems are used to reduce releases of radioactivity when the projected doses in a period of 31 days would exceed 2% of the guidelines for the annual dose or dose commitment, conforming to 10 CFR 50, Appendix I;
- g. Limitations on the dose rate resulting from radioactive material released in gaseous effluents to areas beyond the site boundary conforming to the dose associated with 10 CFR 20, Appendix B, Table 2, Column 1;
- h. Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from the plant to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I;
- i. Limitations on the annual and quarterly doses to a member of the public from iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half lives > 8 days in gaseous effluents released from the plant to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I; and
- j. Limitations on the annual dose or dose commitment to any member of the public due to releases of radioactivity and to radiation from uranium fuel cycle sources, conforming to 40 CFR 190.

#### 5.5.5

##### Component Cyclic or Transient Limit Program

This program provides controls to track the reactor coolant system cyclic and transient occurrences specified in UFSAR Table 5.1-4 to ensure that components are maintained within the design limits.

#### 5.5.6

##### Pre-Stressed Concrete Containment Tendon Surveillance Program

This program provides controls for monitoring any tendon degradation in pre-stressed concrete containments, including effectiveness of its corrosion protection medium, to ensure containment structural integrity. The Tendon Surveillance Program, inspection frequencies, and acceptance criteria shall be in accordance with Regulatory Guide 1.35, Revision 2.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Tendon Surveillance Program inspection frequencies.

5.5.7

Inservice Testing Program

This program provides controls for inservice testing of ASME Code Class 1, 2, and 3 components including applicable supports. The program shall include the following:

- a. Testing frequencies specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as follows:

<u>ASME Boiler and Pressure Vessel Code and applicable Addenda terminology for inservice testing activities</u>	<u>Required Frequencies for performing inservice testing activities</u>
Weekly	At least once per 7 days
Monthly	At least once per 31 days
Quarterly or every 3 months	At least once per 92 days
Semiannually or every 6 months	At least once per 184 days
Every 9 months	At least once per 276 days
Yearly or annually	At least once per 366 days
Biennially or every 2 years	At least once per 731 days

- b. The provisions of SR 3.0.2 are applicable to the above required Frequencies for performing inservice testing activities;
- c. The provisions of SR 3.0.3 are applicable to inservice testing activities; and
- d. Nothing in the ASME Boiler and Pressure Vessel Code shall be construed to supersede the requirements of any Technical Specification.

5.5.8

Steam Generator (SG) Tube Surveillance Program

Each SG shall be demonstrated OPERABLE by performance of an inservice inspection program in accordance with the Nuclear Policy Manual. This inspection program shall define the specific requirements of the edition and Addenda of the ASME Boiler and Pressure Code, Section XI, as required by 10 CFR 50.55a(g). The program shall include the following:

- a. The inspection intervals for SG tubes shall be specified in the Inservice Inspection Program.

- b. SG tubes that have imperfections > 40% through wall, as indicated by eddy current, shall be repaired by plugging or sleeving.
- c. SG sleeves that have imperfections > 30% through wall, as indicated by eddy current, shall be repaired by plugging.

5.5.9

Secondary Water Chemistry Program

This program provides controls for monitoring secondary water chemistry to inhibit SG tube degradation. This program shall include:

- a. Identification of a sampling schedule for the critical variables and control points for these variables;
- b. Identification of the procedures used to measure the values of the critical variables;
- c. Identification of process sampling points;
- d. Procedures for the recording and management of data;
- e. Procedures defining corrective actions for all off control point chemistry conditions; and
- f. A procedure identifying the authority responsible for the interpretation of the data and the sequence and timing of administrative events, which is required to initiate corrective action.

5.5.10

Ventilation Filter Testing Program (VFTP)

A program shall be established to implement the following required testing of Engineered Safety Feature filter ventilation systems and the Spent Fuel Pool (SFP) Charcoal Adsorber System. The test frequencies will be in accordance with Regulatory Guide 1.52, Revision 2, except that in lieu of 18 month test intervals, a 24 month interval will be implemented. The test methods will be in accordance with Regulatory Guide 1.52, Revision 2, except as modified below.

- a. Containment Recirculation Fan Cooler System
  - 1. Demonstrate the pressure drop across the high efficiency particulate air (HEPA) filter bank is < 3 inches of water at a design flow rate ( $\pm 10\%$ ).
  - 2. Demonstrate that an in-place dioctylphthalate (DOP) test of the HEPA filter bank shows a penetration and system bypass < 1.0%.

- 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 ( $\pm 10\%$ ).
  - 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:

- a. The limits for concentrations of hydrogen and oxygen in the waste gas decay tanks and a surveillance program to ensure the limits are maintained. Such limits shall be appropriate to the system's design criteria (i.e., whether or not the system is designed to withstand a hydrogen explosion); and
- b. A surveillance program to ensure that the quantity of radioactivity contained in each waste gas decay tank is less than the amount that would result in a whole body exposure of  $\geq 0.5$  rem to any individual in an unrestricted area, in the event of an uncontrolled release of the tanks' contents.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Explosive Gas and Storage Tank Radioactivity Monitoring Program surveillance frequencies.

#### 5.5.12

##### Diesel Fuel Oil Testing Program

A diesel fuel oil testing program to implement required testing of both new fuel oil and stored fuel oil shall be established. The program shall include sampling and testing requirements, and acceptance criteria, all in accordance with applicable ASTM Standards. The purpose of the program is to establish the following:

- a. Acceptability of new fuel oil for use prior to addition to storage tanks by determining that the fuel oil has:
  - 1. an API gravity or an absolute specific gravity within limits,
  - 2. a flash point and kinematic viscosity within limits for ASTM 2D fuel oil, and
  - 3. a clear and bright appearance with proper color or a water and sediment content within limits; and
- b. Within 31 days following addition of the new fuel to the storage tanks, verify that the properties of the new fuel oil, other than those addressed in a. above, are within limits for ASTM 2D fuel oil; and
- c. Total particulate concentration of the fuel oil is  $\leq 10$  mg/l when tested every 92 days.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Diesel Fuel Oil Testing Program test frequencies.

5.5.13

Technical Specifications (TS) Bases Control Program

This program provides a means for processing changes to the Bases of these Technical Specifications.

- a. Changes to the Bases of the TS shall be made under appropriate administrative controls and reviews.
- b. Licensees may make changes to Bases without prior NRC approval provided the changes do not require either of the following:
  1. A change in the TS incorporated in the license; or
  2. A change to the UFSAR or Bases that requires NRC approval pursuant to 10 CFR 50.59.
- c. The Bases Control Program shall contain provisions to ensure that the Bases are maintained consistent with the UF SAR.
- d. Proposed changes that meet the criteria of Specification 5.5.13.b.1 or Specification 5.5.13.b.2 shall be reviewed and approved by the NRC prior to implementation. Changes to the Bases implemented without prior NRC approval shall be provided to the NRC on a frequency consistent with 10 CFR 50.71e.

5.5.14

Safety Function Determination Program (SFDP)

This program ensures loss of safety function is detected and appropriate actions taken. Upon entry into LCO 3.0.6, an evaluation shall be made to determine if loss of safety function exists. Additionally, other appropriate actions may be taken as a result of the support system inoperability and corresponding exception to entering supported system Condition and Required Actions. This program implements the requirements of LCO 3.0.6. The SFDP shall contain the following:

- a. Provisions for cross train checks to ensure a loss of the capability to perform the safety function assumed in the accident analysis does not go undetected;
- b. Provisions for ensuring the plant is maintained in a safe condition if a loss of function condition exists;
- c. Provisions to ensure that an inoperable supported system's Completion Time is not inappropriately extended as a result of multiple support system inoperabilities; and
- d. Other appropriate limitations and remedial or compensatory actions.

A loss of safety function exists when, assuming no concurrent single failure, a safety function assumed in the accident analysis cannot be performed. For the purpose of this program, a loss of safety function may exist when a support system is inoperable, and:

- a. A required system redundant to the supported system(s) is also inoperable; or
- b. A required system redundant to the system(s) in turn supported by the inoperable supported system is also inoperable; or
- c. A required system redundant to the inoperable support system(s) for the supported systems (a) and (b) above is also inoperable.

The SFDP identifies where a loss of safety function exists. If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

#### 5.5.15

#### Containment Leakage Rate Testing Program

A program shall be established to implement the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program," dated September 1995.

The peak calculated containment internal pressure for the design basis loss of coolant accident,  $P_a$ , is 60 psig.

The maximum allowable primary containment leakage rate,  $L_a$ , at  $P_a$ , shall be 0.2% of containment air weight per day.

Leakage Rate acceptance criteria are:

- a. Containment leakage rate acceptance criterion is  $\leq 1.0 L_a$ . During the first plant startup following testing in accordance with this program, the leakage rate acceptance criteria are  $\leq 0.60 L_a$  for the Type B and Type C tests and  $\leq 0.75 L_a$  for Type A tests;
- b. Air lock testing acceptance criteria are:
  1. For each air lock, overall leakage rate is  $\leq 0.05 L_a$  when tested at  $\geq P_a$ , and
  2. For each door, leakage rate is  $\leq 0.01 L_a$  when tested at  $\geq P_a$ .

- c. Mini-purge valve acceptance criteria is  $\leq 0.05 L_a$  when tested at  $\geq P_a$ .

The provisions of SR 3.0.2 do not apply to the test frequencies specified in the Containment Leakage Rate Testing Program.

The provisions of SR 3.0.3 do not apply to the test frequencies specified in the Containment Leakage Rate Testing Program.

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