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

April 14, 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: Response to March 16, 2005 Conference Call
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

References: 1. Letter from Joseph A. Widay to Robert L. Clark (NRC), dated November 8, 2004, "Bulletin 2003-01 RAIs"

Dear Ms. Skay:

On September 9, 2004, the NRC issued a Request for Additional Information (RAI) regarding Ginna's response NRC Bulletin 2003-01, Potential Impact of Debris Blockage on Emergency Sump Recirculation at Pressurized-Water Reactors. Ginna's response to those RAIs is contained in Reference 1. During our March 16, 2005 phone conversation with you and Mr. Leon Whitney of the Plant Systems Branch, you indicated that additional information was required to answer RAI number two (2). Specifically, Mr. Whitney requested that Ginna provide the rationale as to why Westinghouse Owners Group (WOG) Candidate Operator Actions (COAs) 2,3,4,6,7,10 and 11 were not planned to be implemented at Ginna. This information is provided in Attachment 1. If you have any questions regarding this submittal, please contact Mr. George Wrobel at (585) 771-3535.

Very truly yours,

Mary G. Korsnick

Mary G. Korsnick

A103

1001295

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 14 day of April, 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, 20 06

My Commission Expires:

12-21-06
Date

Attachments:

1. Supplemental Information - Candidate Operator Action (COA)

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

Regional Administrator, Region 1
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

U.S. NRC Ginna Senior Resident Inspector

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

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

Mr. Carey Fleming
Counsel, Generation - Nuclear
Constellation Energy
750 East Pratt Street, 17th Floor
Baltimore, MD 21202

ATTACHMENT 1

Supplemental Information - Candidate Operator Action (COA)

COA-2

Manually Establish One Train of Containment Sump Recirculation Prior to Automatic Actions:

The Ginna Station ECCS does not have any automatic action features to align to the recirculation phase. Furthermore, the design is such that ECCS cannot have one train aligned for recirculation while the second train is aligned for injection. Therefore, COA-2 is not applicable to Ginna.

COA-3

Terminate One Train of Safety Injection after Recirculation Alignment:

When entering sump recirculation, the Ginna EOPs stop all high head SI pumps and initially start only the RHR (Low Head SI) pumps. The high head SI pumps would only be re-started if core cooling was insufficient based on RVLIS and CETs. Also, as stated in Reference 1 (in the "other procedure changes considered" section following the discussion of COA-8), we are considering starting only one RHR pump (Low-head Safety Injection pump) during initial sump recirculation. These actions are considered comparable to the recommendations of COA-3.

COA-4

Early Termination of One LPSI/RHR Pump Prior to Recirculation Alignment:

This COA was addressed under "other procedure changes considered" in the paragraph following the discussion of COA-8

COA-6

Inject More than One RWST Volume from a Refilled RWST or by Bypassing the RWST:

The WOG Sump Blockage Control Room Guideline (SBCRG) includes this action. The Ginna specific version of SBCRG (ECA-1.3) implements this COA consistent with the SBCRG.

COA-7

Provide More Aggressive Cooldown and Depressurization Following a Small Break LOCA:

This COA only applies to CE guidelines. Since Ginna is a Westinghouse plant, and the Westinghouse Emergency Response Guidelines (ERGs) already address maximizing the cooldown rate up to the Technical Specification limits, COA-7 is not applicable to Ginna.

COA-10

Early Termination of One Train of HPSI/High-Head Injection Prior to Recirculation Alignment:

COA 10 applies only to CE plants. Since Ginna is a Westinghouse plant, COA-10 is not applicable to Ginna.

COA-11

Prevent or Delay Containment Spray for Small Break LOCAs (<1.0 Inch Diameter) in Ice Condenser Plants:

This COA only applies to ice condenser plants. Since Ginna is not equipped with ice condensers, COA-11 is not applicable to Ginna.