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

August 31, 2005

U. S. Nuclear Regulatory Commission
Washington, DC 20555

ATTENTION: Document Control Desk

SUBJECT: **R.E. Ginna Nuclear Power Plant**
Docket No. 50-244

Revised Supplementary Information Associated with the Proposed License Amendment to Provide a One-time Integrated Leak Rate Test (ILRT) Interval Extension

On June 8, 2005, R.E. Ginna Nuclear Power Plant, LLC (Ginna LLC) submitted additional information associated with a proposed license amendment request for a onetime extension to the ILRT interval frequency. Subsequent to the submittal of the additional information, as the result of recent discussions with the NRC staff, Ginna LLC would like to provide the attached update to the information provided in response to question 4 within the attachment to the June 28, 2005 correspondence.

There are no new commitments being made in this submittal. Should you have questions regarding the information in this submittal, please contact George Wrobel at (585) 771-3535 or george.wrobel@constellation.com.

Very truly yours,

Mary G. Korsnick

A001

1001384

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 request 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 31 day of August, 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

Attachment: ILRT Frequency Extension Revised Supplemental Information

cc: S. J. Collins, NRC
D. M. Skay, NRC
Resident Inspector, NRC

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 Plaza, 10th Floor
Albany, NY 12223-1350

ATTACHMENT

ILRT Frequency Extension Revised Supplemental Information

ILRT Frequency Extension Revised Supplemental Information

In response to Question 4, within the attachment to the June 28, 2005 supplemental information submittal, a table was provided comparing the risk assessment evaluation results for various methodologies. The methodologies included, the 1994 EPRI methodology, the NEI Interim Guidance from November 2001, and the EPRI "Risk Impact Assessment of Extended Integrated Leak Rate Testing Intervals", Document 1009325, Final Report, December 2003. During the NRC staff review of the supplemental information the percentage increase in person-rem/yr associated with the proposed ILRT extension was questioned. The increase was higher than in other typical industry submittals.

As the result of the NRC staff question, Ginna LLC re-evaluated the basis for the dose results provided within the table. The increase was driven by the calculated 22,700 person-rem/accident with an intact containment. This value is obtained from a MACCS2 computer code using containment release fractions from the Severe Accident Mitigation Alternatives (SAMA) evaluation. In general, most release fractions less than 1E-5 were assigned a value of 1E-5 as a conservative lower limit. Further, a transcription error was made and the CsI release fraction was increased by several times. Using the correct CsI release fraction in the MACCS2 calculation caused the intact containment dose to drop by a factor of two. With the remaining radionuclides (i.e. Te, Ba, Sr, Mo, La, and Ce) limited to 1E-5, these radionuclides were contributing a substantial portion of the dose to the public. When other early release accidents were examined that contain a substantially higher amount of CsI released, the remaining "limited" radionuclides are one to three orders of magnitude lower than the CsI release fractions. Based on these other early release accidents, a ratioing approach was utilized to provide a more accurate estimate of release fractions that had been conservatively set to 1E-5, for the intact containment case.

The revised increase in person-rem/year over baseline for the NEI Interim Guidance methodology is 1.65%. In our last evaluation, the increase was 10.9%. The change from 10.9% to 1.65% is the result of adjusting the person-rem dose in a 50 miles radius as a result of each accident class. The 10.9% increase was based on 22,700 person-rem in a 50-mile radius/intact containment accident. The 1.65% increase was based on 3,270 person-rem in a 50-mile radius/intact containment accident, which results from the updated release fractions discussed above. The expected value in person-rem per year with the ILRT 3 times in ten years is 13.644. With the ILRT once per 15 yr, the value is 13.868 person-rem per year. This is a net change of 0.224 person-rem/yr in a 50 mile radius.

The power level was also adjusted to reflect a 17% Extended Power Uprate (EPU) versus a 10% EPU in the original SAMA evaluation. This change did not significantly affect the percentage increase in dose, but did slightly increase the overall dose. Other than the release fraction changes and power level changes, the remaining MACCS2 parameters used in the calculation remain the same. Attached are the revised results. The transcription error has been entered into the Ginna corrective action program.

	Attachment 1 to the March 10, 2005 letter	NEI Interim Guidance Nov. 2001	EPRI 1009325 Dec. 2003
When the ILRT interval is 15 years, the risk contribution of leakage (person-rem/yr) represented by Class 3 accident scenarios is increased to:	**0.61%** of the total risk.	**2.21%** of the total risk.	**0.38%** of the total risk.
The total integrated increase in risk contribution from reducing the ILRT test frequency from the once-per-10-year frequency to once-per-15 years is:	**0.02%**	**0.68%**	**0.12%**
The total integrated increase in risk contribution from reducing the ILRT test frequency from 3-per-10-year (baseline) frequency to once-per-15 years is:	**0.07%**	**1.65%**	**0.28%**
The risk increase in LERF from the original 3-in-10 years test frequency to once-per-15 years is:	2.44E-08/yr	5.20E-07/yr	4.67E-08/yr
The risk increase in LERF over the once-per-10 year test interval(per-year):	7.38E-09/yr	2.17E-07/yr	1.95E-08/yr
The increase in conditional containment failure probability (CCFP) from the once-per-10-year test interval:	0.16%	0.4%	0.04%
The increase in conditional containment failure probability (CCFP) from the original 3-in-10 years test frequency to once-per-15 years is:	0.49%	0.97%	0.09%