April 13,2006

Mrs. Mary G. Korsnick Vice President R.E. Ginna Nuclear Power Plant R.E. Ginna Nuclear Power Plant, LLC 1503 Lake Road Ontario, NY 14519

SUBJECT: R.E. GINNA NUCLEAR POWER PLANT, REQUEST FOR ADDITIONAL

INFORMATION RE: RELIEF REQUEST PR-3 FOR USE OF LATER CODE

EDITION (TAC NO. MD0316)

Dear Mrs. Korsnick:

On March 7, 2006, R.E. Ginna Nuclear Power Plant, LLC (Ginna LLC), requested approval, pursuant to Section 50.55a(f)(4)(iv) of Part 50 of Title 10 of the *Code of Federal Regulations*, from the Nuclear Regulatory Commission (NRC) to use a later edition of the American Society of Mechanical Engineers *Code for Operations and Maintenance of Nuclear Power Plants* (ASME OM Code). Specifically, Ginna LLC requested to use all related requirements of Subsections ISTA, "General requirements," and ISTB, "In-service Testing of Pumps in Light-Water Reactor Nuclear Power Plants," of the ASME OM Code, 2001 Edition through 2003 Addenda, for the auxiliary feedwater and standby auxiliary feedwater pumps.

During its review of the information provided in support of the application, the NRC staff has determined that additional information is needed to complete its review. Enclosed is the NRC staff's request for additional information (RAI). This RAI was discussed with your staff on April 13, 2006, and it was agreed that your response would be provided within 30 days from the date of this letter.

If you have any questions, please contact me at (301) 415-1457.

Sincerely,

/RA/

Patrick D. Milano, Senior Project Manager Plant Licensing Branch I-1 Division of Operating Reactor Licensing Office of Nuclear Reactor Regulation

Docket No. 50-244

Enclosure:

Request for Additional Information

cc w/encl: See next page

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ADAMS ACCESSION NUMBER: ML061030258

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R.E. Ginna Nuclear Power Plant

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

REQUEST FOR ADDITIONAL INFORMATION

REGARDING INSERVICE TESTING OF AUXILIARY FEEDWATER PUMPS

R.E. GINNA NUCLEAR POWER PLANT

DOCKET NO. 50-244

By letter dated March 7, 2006 (Agencywide Documents Access and Management System Accession No. ML060740421), R.E. Ginna Nuclear Power Plant, LLC (the licensee) requested approval to use a later code edition and addenda of the American Society of Mechanical Engineers *Code for Operations and Maintenance of Nuclear Power Plants* (ASME OM Code), in accordance with Section 50.55a(f)(4)(iv) of Part 50 of Title 10 of the *Code of Federal Regulations*. Specifically, the licensee requested the use of the 2001 Edition through the 2003 Addenda, of the ASME OM Code for the auxiliary feedwater (AFW) pumps and the standby AFW (SAFW) pumps. In order to complete its review of the proposed Relief Request (RR) No. PR-3, the Nuclear Regulatory Commission (NRC) staff requests the following additional information:

- 1. The description of alternate testing in RR No. PR-3 states that the licensee will perform quarterly pump discharge pressure, differential pressure and vibration measurement for the two Group A AFW pumps and a differential pressure measurement for the two Group B SAFW pumps.
 - Will rotational speed measurement also be performed on the two Group A and two Group B SAFW pumps, as required by Table ISTB-3000-1 of the ASME OM Code? If pump rotational speed will not be measured, provide a technical basis.
- 2. NRC Generic Letter (GL) 89-04, Supplement 1, indicates that licensees should consider vendor records of degradation at other facilities (operating experience) when evaluating alternative testing. GL 89-04 also identifies the absence of flow instrumentation in the minimum flow lines as a potential generic deficiency. In addition, Template 1 from the Nuclear Energy Institute (NEI) White Paper (included in NRC Report NUREG-1482, Revision 1, "Guidelines for Inservice Testing Programs at Nuclear Power Plants") suggests that precedents, which have similar situations, and NRC approval be identified. As specified in the introduction section of ASME OM Code, code cases may be issued for alternatives when the need is urgent. In the interest of obtaining a complete review by the Code Committee and improving regulatory efficiency, the use of code inquiries, including code cases, is the preferred method to address generic alternatives from the Code.

In Relief Request No. PR-3, the licensee did not address industry-wide operating experience, plant-specific past precedence, or ASME Code inquiries for this type of alternative to the Code.

Identify if there are any industry-wide operating experiences, plant-specific precedents, or ASME OM Code inquiries for alternatives to Code requirements that are similar to this type of relief request. If such experience, precedents and inquiries exist, evaluate their

- applicability to this relief request, and describe any compensatory actions that will be performed in lieu of the Code requirements.
- 3. In its letter dated March 7, 2006, the licensee identifies that the relief request is being submitted in accordance with 10 CFR 50.55a(f)(4)(iv). This regulation applies to use of later Code Editions and Addenda rather than an impracticality. The licensee identifies that the basis for the relief request is that the Code is impractical and that costly major hardware modifications would be required. As identified in the NEI White Paper, Template 4 is appropriate where the IST Code is impractical and the licensee requests relief under 10 CFR 50.55a(f)(5)(iii). Template 4 identifies that information concerning the impracticality and burden be included in the relief request.

Clarify the basis for this relief request, and/or reconsider the appropriate regulation.