Dave A. Holm
Plant General Manager

R.E. Ginna Nuclear Power Plant, LLC
1503 Lake Road
Ontario, New York 14519-9364
585.771.3635
585.771.3900 Fax
Dave.A.Holm@costellation.com

Constellation Energy
Generation Group

May 5, 2006

U. S. Nuclear Regulatory Commission
Washington, DC 20555

ATTENTION: Document Control Desk

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

Response to Request for Information Re: Application for Amendment to Facility Operating License Revising Technical Specification, Section 3.9.3, to Allow Refueling Operations With the Containment Equipment Hatch Open.

Reference 1: Letter to USNRC Document Control Desk from Mary G. Korsnick (Ginna), subject: Application for Amendment to Facility Operating License Revising Technical Specification, Section 3.9.3, to Allow Refueling Operations with the Containment Equipment Hatch Open, dated November 7, 2005.

Reference 2: Letter to Mary G. Korsnick (Ginna) from Patrick Milano (NRC), subject: R.E. Ginna Nuclear Power Plant – Request for Additional Information Regarding Movement of Fuel with Equipment Hatch Open (TAC No. MC8910), dated March 23, 2006.

On November 7, 2005 R.E. Ginna Nuclear Power Plant, LLC (Ginna) submitted Reference 1 for NRC review. On March 23, 2006 the NRC requested additional information in Reference 2. Also, on April 13, 2006, Ginna and NRC Staff held a conference call to discuss details of the containment hatch configuration and clarify the information requested in Reference 2. Enclosure (1) to this letter contains the requested information based on the above correspondence and subsequent conversation.

Should you have questions regarding the information in this submittal, please contact Mr. Robert Randall at (585) 771-3734 or Robert.Randall@constellation.com.

Very truly yours,

Dave A. Holm

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STATE OF NEW YORK :
: **TO WIT:**
COUNTY OF WAYNE :

I, Dave A. Holm, begin duly sworn, state that I am Plant General Manager, 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.

Subscribed and sworn before me, a Notary Public in and for the State of New York and County of Wayne, this 5th day of May, 2006.

WITNESS my Hand and Notarial Seal:

Notary Public

My Commission Expires:

5 May 2006
Date

DH/MR

Enclosures: 1. Response to Request for Additional Information

RICHARD A. JOHNSON
NOTARY PUBLIC, STATE OF NEW YORK
No. 01JO6082344
QUALIFIED IN WAYNE COUNTY
MY COMMISSION EXPIRES OCT. 21, 20 06

cc: S. J. Collins, NRC
P.D. Milano, NRC
Resident Inspector, NRC (Ginna)
P.D. Eddy, NYSDPS

Enclosure 1

Response to Request for Additional Information

R.E. Ginna Nuclear Power Plant, LLC
May 5, 2006

Response to Request for Additional Information

Question:

In Enclosure 1 to the November 7, 2005, application, the licensee states that the proposed amendment would permit either both equipment hatch doors, the closure plate access door, or the roll-up door associated with the enclosure building to be open during refueling. The control room atmospheric dispersion factor (X/Q value) used in the dose assessment to support this amendment request assumes that the equipment hatch is the limiting case because it is the largest penetration and has the shortest distance to the control room intake. However, the equipment hatch to control room X/Q values were generated assuming a diffuse (area) release, which could result in lower X/Q values than for a point source release slightly further from the control room intake.

Confirm that the control room X/Q values associated with a postulated release from the equipment hatch are more limiting than the postulated releases from the closure plate access door or the roll-up door associated with the enclosure building.

Response:

The enclosure building encloses the entire hatch assembly, including the barrel and associated airlock. The front of the enclosure building is isolated from the environment by the roll-up door referenced in the submittal. Reference 1 includes three methods of containment closure.

1. Typical operation during refueling is to remove the hatch barrel and air-lock assembly by withdrawing them through the roll-up door to a remote location using a rail track system. Containment closure is then obtained by closing the roll-up door. Should a refueling accident occur in this configuration, the activity would disperse into the containment atmosphere and diffuse through the 14 foot diameter opening in the containment wall into the enclosure building, and then exit to the environment through the rollup door at the opposite end of the enclosure building. These assumptions are valid for the analysis presented in Reference 1. The rollup door diffuse area source, whether the door is open or closed, are assumed to be equivalent based on the guidance in Regulatory Guide 1.194, section 3.2.4.

2. Should the rollup door become inoperable, closure could be obtained by reinstalling the hatch barrel/airlock assembly. The end of the hatch barrel is approximately 4 feet inside the rollup door in this configuration. Because the end of the hatch barrel is close to the rollup door opening, it could be conservatively assumed that no dispersion would occur in the enclosure building before entering the environment. The area source is represented by the airlock door with dimensions of approximately 3'7" by 6'9".

3. If the rollup door and hatch barrel/airlock assembly are unavailable, closure could be obtained by covering the 14 foot diameter opening in the containment wall with the closure plate, which contains a personnel access door with dimensions of approximately 4' by 8'. Any release would be through the open personnel access door in the closure plate, into the enclosure building and then out the open rollup door on the opposite end of the enclosure building.

Of the above configurations option 2 was evaluated because, although slightly further from the control room intake than the rollup door, the dimensions of the opening are smaller. Also, because of the proximity of the hatch barrel personnel door to the rollup door, no credit for dispersion in the enclosure building is considered. With the new dimensions and distances calculated as a defuse area source, the

X/Q increases from 5.58E-03 to 5.76E-3, which is a change of approximately 3 % from the value reported in Reference 1. Applying the new X/Q, the post EPU calculated control room dose would increase by 0.05 Rem to 1.45 Rem TEDE. Therefore, all hatch configuration options presented in Reference 1 are acceptable from a dose perspective.