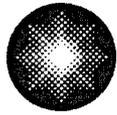


Dave Holm
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Constellation Energy
Generation Group

May 15, 2006

U. S. Nuclear Regulatory Commission
Washington, DC 20555

ATTENTION: Document Control Desk

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

Supplemental Submittal of Relief Request PR-3

- References:**
- (1) Letter from D. Holm, Ginna LLC, to NRC Document Control Desk, Subject: Response to Request for Additional Information Regarding Relief Request PR-3, dated May 1, 2006.
 - (2) Letter from P. Milano, NRC, to M. Korsnick, Ginna LLC, 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), dated April 13, 2006.
 - (3) Letter from M. Korsnick, Ginna LLC, to NRC Document Control Desk, Subject: Submittal of Relief Request PR-3 Related to the Requirements of 10CFR50.55a(f), dated March 7, 2006.

In Reference 1, R.E. Ginna Nuclear Power Plant, LLC (Ginna LLC) provided a response to the NRC Request for Additional Information (RAI) (Reference 2) related to a proposed relief request for Ginna Station concerning the ASME Section XI Inservice Testing Program (Reference 3). During conversations with the NRC staff on May 11, 2006 it was determined that in the best interest of both parties that Ginna LLC revise the proposed relief request to only address the current Ginna LLC code of record and not propose a request for use of a later code edition. The intent of this request is to incorporate Generic Letter 89-04 Position 9 and subsequently adopt the Comprehensive, Group A, and Group B test protocols using the ASME OM Code, 2001 Edition through 2003 Addenda for guidance. Ginna LLC is not incorporating the later edition of the code, rather utilizing it to establish the test protocols. The attached revised relief request delineates the proposed alternative testing.

No new commitments are being made in this letter.

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Due to the strong desire to suspend the current testing protocol that requires a reactivity change and also introduces a potential for intrusion of service water (Lake Ontario) into the steam generators, verbal approval of the attached request is desired as soon as practical. It is believed that Ginna LLC has made a good faith effort to meet our and the NRC's schedule requirements and that the verbal request is justified.

Should you have questions regarding the information in this submittal, please contact Mr. Robert Randall at (585) 771-3535 or Robert.Randall@constellation.com.

Very truly yours,

A handwritten signature in black ink, appearing to read "Dave A. Holm". The signature is fluid and cursive, with a long horizontal stroke at the end.

Dave A. Holm

Enclosure (1) Relief Request PR-3

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

Enclosure 1
Relief Request PR-3

GINNA LLC IN-SERVICE TESTING PROGRAM

RELIEF REQUEST PR-3

Proposed Alternative
In Accordance with 10 CFR 50.55a(a)(3)(ii)

Hardship or Unusual Difficulty without Compensating
Increase in Level of Quality and Safety

1.0 ASME Code Component(s) Affected

Components: Auxiliary Feedwater Pumps (AFW):

"A" preferred motor-driven AFW pump - PAF01A

"B" preferred motor-driven AFW pump - PAF01B

Turbine-driven AFW pump - PAF03

"C" standby motor-driven AFW pump - PSF01A

"D" standby motor-driven AFW pump - PSF01B

Class: 3

Quantity: 5 pumps

2.0 Applicable Code Edition and Addenda

ASME Boiler & Pressure Vessel Code - Section XI Division 1, "Rules for Inservice Inspection and Testing of Nuclear Power Plant Components", 1989 Edition, ASME/ANSI OMa-1988, "Operation and Maintenance of Nuclear Power Plants" Part 6.

3.0 Applicable Code Requirement

Part 6, 5.2: An inservice test shall be conducted with the pump operating at specified test reference conditions. The test parameters shown in Table 2 shall be determined and recorded as directed in this paragraph. The test shall be conducted as follows.

Part 6, 5.2(b) The resistance of the system shall be varied until the flow rate equals the reference value. The pressure shall then be determined and compared to its reference value. Alternatively, the flow rate can be varied until the pressure equals the reference value and the flow rate shall be determined and compared to the reference flow rate value.

Part 6, 5.2(c) Where system resistance cannot be varied, flow rate and pressure shall be determined and compared to their respective reference values.

Part 6, 5.2(d) Pressure, flow rate, and vibration (displacement or velocity) shall be determined and compared with corresponding reference values. All deviations from the reference values shall be compared with the limits given in Table 3 and corrective action taken as specified in para. 6.1. Vibration measurements are to be broad band (unfiltered). If velocity measurements are used, they shall be peak. If displacement amplitudes are used, they shall be peak-to-peak.

4.0 Reason for Request

Current testing protocol tests the pumps at the design flow rate being delivered to the associated steam generator on a quarterly basis. This test protocol has the potential to chemically contaminate the steam generators due to service water intrusion from Lake Ontario, the emergency supply source. There have been previous occurrences of this. The current test protocol also requires a reactivity change due the large amount of cold water that is being delivered to the steam generator. This activity places an undue burden on the operating staff.

In order to obviate the risks associated with the current testing methodology, quarterly testing of these pumps is proposed to be performed using minimum flow recirculation lines. Four of the pumps (PAF01A, PAF01B, PSF01A, PSF01B) are not equipped with instrumentation to provide the measurement of pump flow as required by the Code. Flow is not variable for all AFW pumps due to an installed flow orifice which establishes a nominal 40 gpm flow rate (80 gpm for pump PAF03) when the pump is operated in the recirculation mode. The pump minimum flow recirculation line must be used when these pumps are tested on a quarterly interval during power operation to avoid challenging the normal operation of the Unit.

In order to adopt this methodology a relief request is required. The basis for the relief includes the fact that it is estimated to cost more than \$60,000 annually to install and maintain temporary flow measurement devices (ultrasonic flow meters and their associated hardware, software, precision "wet-calibration" and maintenance costs) to support quarterly testing for the pumps. In addition, the use of temporary flow measurement equipment would pose a personnel safety risk given the approximate 20 foot overhead elevation of the associated minimum flow recirculation piping. Installation of permanent flow devices on the Auxiliary Feedwater minimum flow recirculation lines is estimated to cost more than \$300,000. Therefore, the requirement to install temporary or permanent instrumentation to meet the Code requirements imposes an undue burden for the information that would be gained.

6.0 Proposed Alternative and Basis for Use

Proposed Alternative: The Auxiliary Feedwater Pumps will be group designated commensurate with the definitions of ASME OM CODE-2001, ISTB-2000:

GROUP A PUMPS

"A" preferred motor-driven AFW pump - PAF01A

"B" preferred motor-driven AFW pump - PAF01B

GROUP B PUMPS

Turbine-driven AFW pump - PAF03

"C" standby motor-driven AFW pump - PSF01A

"D" standby motor-driven AFW pump - PSF01B

Quarterly testing of the designated Group A AFW pumps (PAF01A, PAF01B) will be performed on mini-flow recirculation measuring the differential pressure across the pump and measuring vibration, using ASME OM CODE-2001, ISTB-5121, and NRC Generic Letter 89-04, Staff Position 9, 'Pump Testing Using Minimum-Flow Return Line With Or Without Flow Measuring Devices', for guidance.

Quarterly testing of the designated Group B AFW pumps (PAF03, PSF01A, PSF01B) will be performed on mini-flow recirculation measuring the differential pressure across the pump, using ASME OM CODE-2001, ISTB-5122, and NRC Generic Letter 89-04, Staff Position 9, 'Pump Testing Using Minimum-Flow Return Line With Or Without Flow Measuring Devices', for guidance.

Quarterly testing of the designated Group B AFW pump (PAF03) will also include speed measurement and flow measurement.

A biennial Comprehensive Pump Test (CPT) will be performed for all five AFW pumps, using ASME OM CODE-2001, ISTB-5123 for guidance, and will include the following measurements:

Speed (PAF03 only)

Differential Pressure

Flow Rate

Vibration

Basis for Use:

The AFW pumps each have a minimum-flow path that can be utilized for the respective Group A and Group B tests. The minimum flow lines used for these pumps provide a fixed resistance flow path from the pump discharge to the Condensate Storage or Test Tank(s) and then back to the suction of each pump. During the performance of the quarterly pump testing, pump differential pressure will be measured and trended. This provides a

reference value for differential pressure that can be duplicated during subsequent tests.

The performance of pump tests using a fixed resistance flow path is an acceptable alternative to the Code requirements as per NRC Generic Letter 89-04, Staff Position 9, 'Pump Testing Using Minimum-Flow Return Line With Or Without Flow Measuring Devices.' This methodology provides for the acquisition of repeatable differential pressure measurement, which is an adequate means of monitoring pump degradation. The tests associated with the grouping of the AFW pumps have been endorsed through a later code edition.

Concerns identified in NRC Bulletin 88-04, 'Potential Safety-Related Pump Loss', with regard to minimum recirculation flow line sizing, have been assessed and verified to not be of concern during pump testing.

Therefore, the current testing protocol which has a potential for service water intrusion and requires a reactivity change, and the cost of installing either temporary or permanent flow instrumentation, imposes an undue burden without a compensating increase in the level of quality and safety.

6.0 Duration of Approved 10 CFR 50.55a Request

This request is for the remainder of the 4th 10-year program interval that shall terminate on December 31, 2009.

7.0 Precedents

A similar relief request with regard to quarterly testing on recirculation (IST-3-P-3) was approved for the Southern California Edison San Onofre Nuclear Generating Station (SONGS), Units 2 and 3, in correspondence dated April 21, 2004 (ML041140166).

8.0 References

NUREG-1482, 'Guidelines for Inservice Testing at Nuclear Power Plants', November 1993.