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April 6, 2007

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 Additional Information Regarding R.E. Ginna  
Response to Generic Letter (GL) 2003-01, "Control Room Habitability" (TAC  
No. MB9807)

Reference 1: Letter from Mary G. Korsnick (Ginna) to USNRC Document Control Desk,  
Supplemental Response to NRC Generic Letter 2003-01, Control Room  
Habitability, dated August 31, 2005.

Reference 2: Letter from Douglas V. Pickett (NRC) to Mary G. Korsnick (Ginna), Request  
for Additional Information Regarding R.E. Ginna Response to Generic Letter  
(GL) 2003-01, "Control Room Habitability" (TAC No. MB9807), dated  
February 12, 2007

On August 31, 2005, R.E. Ginna Nuclear Power Plant, LLC (Ginna, LLC) provided a supplemental  
response (Reference 1) to Generic Letter (GL) 2003-01. On February 12, 2007 the NRC requested  
additional information (Reference 2) regarding that response. Attachment (1) provides the Ginna, LLC  
response to Reference 2 and Attachment (2) provides a list of regulatory commitments contained in this  
letter.

Should you have questions regarding the information in this submittal, please contact Mr. Robert  
Randall at (585) 771-5219 or [Robert.Randall@constellation.com](mailto:Robert.Randall@constellation.com).

Very truly yours,

A handwritten signature in black ink that reads "Mary G. Korsnick". The signature is written in a cursive, flowing style.  
Mary G. Korsnick

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MK/MR

Attachments: (1) Response to Request for Additional Information  
(2) List of Regulatory Commitments

cc: S. J. Collins, NRC  
D.V. Pickett, NRC  
Resident Inspector, NRC (Ginna)  
P.D. Eddy, NYSDPS  
J. P. Spath, NYSERDA

**Attachment (1)**

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**Response to Request for Additional Information**

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Attachment (1)

Response to Request for Additional Information

Requested Information:

*Generic Letter (GL) 2003-01 requested confirmation that your facility's control room meets the applicable habitability regulatory requirements and that the control room habitability systems are designed, constructed, configured, operated, and maintained in accordance with the facility's design and licensing bases. Item 1c of the GL requested that you confirm that your Technical Specifications (TSs) verify the integrity of the control room envelope and the assumed inleakage rates of potentially contaminated air. The GL further requested that if you currently have a  $\Delta P$  surveillance requirement (SR) to demonstrate control room envelope integrity, that you provide the basis for your conclusion that it remains adequate to demonstrate control room envelope integrity in light of ASTM E741 testing results. If you concluded that your  $\Delta P$  SR is no longer adequate, the GL requested that you provide a schedule for:*

- 1. Revising the SR in your TSs to reference an acceptable surveillance methodology (e.g., ASTM E741), and*
- 2. Making any necessary modifications to your control room envelope so that compliance with your new SR could be demonstrated. If you do not currently have a TS SR for control room envelope integrity, you were requested to explain how and at what frequency you confirm control room envelope integrity and why that method is adequate to demonstrate control room envelope integrity.*

*In your August 31, 2005, response to Item 1c of GL 2003-01, you stated that Ginna's TSs do not presently contain SRs to verify assumed in-leakage. You further stated that you recently verified that control room in-leakage is less than that assumed in the various analyses, (as stated in your response to Item 1a of GL 2003-01) and that the industry and the NRC are currently working toward resolution on Technical Specification Task Force (TSTF) 448, and a change to NUREG-1431 Standard Technical Specifications, which will answer these concerns (i.e., surveillance testing). You stated that you will continue to work with the NRC and industry in this regard and that when appropriate regulatory guidance is available, you will consider submitting a Technical Specification amendment request based on that guidance.*

*Based on the above, it is requested that you submit an additional response to Item 1c of GL 2003-01 that includes the following:*

- 1. An explanation of how and at what frequency you currently confirm control room envelope integrity and why that method is adequate to demonstrate control room envelope integrity (as originally requested in GL 2003-01, Item 1c).*
- 2. A description of your plans to adopt TSTF-448, including a commitment to submit an LAR based on TSTF-448. The commitment should include a milestone for completion (such as within 90 days of the NRC's approval of TSTF-448). Or, in the event that you decide not to submit an LAR to adopt applicable sections of TSTF-448 into your TSs, the NRC staff requests that you provide: (a) an acceptable alternative that will ensure your control room envelope will be in compliance with the regulations; and, (b) in light of the commitment made by the majority of the respondents to adopt applicable portions of TSTF-448, explain your rational (including any potential hardship) for not committing to this industry standard.*

**Response:**

As stated in Reference 1, Ginna LLC confirmed the control room envelope integrity in February of 2005 using ASTM E741 test methodology. The results indicated a measured inleakage well below the inleakage assumed in the accident dose and chemical analyses. Ginna TS do not contain a requirement to perform this test. Therefore, until such time that a new TS surveillance requirement (SR) is approved, Ginna LLC commits to perform a self assessment of the integrity of the control room boundary in 2008, followed by another inleakage test using ASTM E741 methodology in 2011. Since this commitment is consistent with Regulatory Guide 1.197, Ginna will adequately demonstrate control room envelope integrity.

Ginna LLC will adopt TSTF-448 consistent with the existing Control Room Emergency Air Treatment System (CREATS) design, and commits to submit the associated license amendment request by August 27, 2007.

**Attachment (2)**

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**List of Regulatory Commitments**

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**Attachment (2)**

**List of Regulatory Commitments**

The following table identifies those actions committed to by R.E. Ginna Nuclear Power Plant, LLC in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments. Please direct questions regarding these commitments to Robert Randall at (585) 771-5219, or [Robert.Randall@constellation.com](mailto:Robert.Randall@constellation.com).

<b>REGULATORY COMMITMENT</b>	<b>DUE DATE</b>
Submit a license amendment request to adopt TSTF-448 consistent with existing CREATS design.	August 27, 2007
Perform a self assessment of the control room boundary.	February 8, 2008 (This commitment date is three (3) years from the initial inleakage test as directed by Regulatory Guide 1.197, and may be adjusted per SR 3.0.2 as indicated in TSTF-448)
Measure control room inleakage using ASTM E741 methodology.	February 8, 2011 (This commitment date is six (6) years from the initial inleakage test as directed by Regulatory Guide 1.197 and may be adjusted per SR 3.0.2, as indicated in TSTF-448)