

John Carlin  
Site Vice President

R.E. Ginna Nuclear Power Plant, LLC  
1503 Lake Road  
Ontario, New York 14519-9364  
585.771.5200  
585.771.3943 Fax  
John.carlin@constellation.com



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U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

**Attention:** Document Control Desk

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

Supplement to Application for Technical Specification Change to Add LCO 3.0.8 on the Inoperability of Snubbers Using the Consolidated Line Item Improvement Process

**Reference:** (a) Letter from J.M. Heffley (CNGG) to Document Control Desk (NRC), dated October 17, 2007, "Application for Technical Specification Change to Add LCO 3.0.8 on the Inoperability of Snubbers Using the Consolidated Line Item Improvement Process"

Reference (a) submitted a request to change the Technical Specifications for Calvert Cliffs Nuclear Power Plant and R.E. Ginna Nuclear Power Plant to add Limiting Condition for Operation (LCO) 3.0.8. In that submittal we inadvertently omitted a markup for a related change to LCO 3.0.1. This supplement provides a R.E. Ginna Nuclear Power Plant markup for that change and is included in Attachment 1. The markup for Calvert Cliffs Nuclear Power Plant will be submitted separately.

We are also providing a proposed markup of the Technical Specification Bases for the new LCO 3.0.8 in the enclosed Attachment 2. This markup is related to Reference (a) and is provided for information only.

1001894

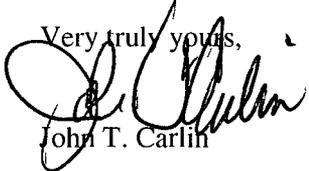
A001  
MRB

Analysis

The new LCO 3.0.8 will provide an allowance of time to repair or replace an inoperable seismic snubber without declaring the supported system inoperable. LCO 3.0.1 requires LCOs to be complied with except as provided in certain LCOs. Since LCO 3.0.8 will provide an exception to LCO 3.0.1, it should be listed among the exceptions. This supplement adds LCO 3.0.8 to the exceptions.

Adding the reference to LCO 3.0.8 in LCO 3.0.1 does not change the Significant Hazards Discussion in Reference (a).

Should you have any questions regarding the information in this submittal, please contact Mr. Brian R. Weaver at (585)771-5219 or [brian.weaver@constellation.com](mailto:brian.weaver@constellation.com).

Very truly yours,  
  
John T. Carlin



**ATTACHMENT (1)**

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**TECHNICAL SPECIFICATION MARKUP –  
LCO 3.0.1**

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3.0 LIMITING CONDITION FOR OPERATION (LCO) AND SURVEILLANCE  
REQUIREMENT (SR) APPLICABILITY

3.0 Limiting Condition For Operation (LCO) Applicability

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LCO 3.0.1 LCOs shall be met during the MODES or other specified conditions in the Applicability, except as provided in LCO 3.0.2 and LCO 3.0.7 and LCO 3.0.8.

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LCO 3.0.2 Upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met, except as provided in LCO 3.0.5 and LCO 3.0.6.

If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required unless otherwise stated.

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LCO 3.0.3 When an LCO is not met and (1) the associated ACTIONS are not met, (2) an associated ACTION is not provided, or (3) if directed by the associated ACTIONS, the plant shall be placed in a MODE or other specified condition in which the LCO is not applicable. Action shall be initiated to place the plant, as applicable, in:

- a. MODE 3 within 6 hours;
- b. MODE 4 within 12 hours; and
- c. MODE 5 within 36 hours.

Exceptions to this Specification are stated in the individual Specifications.

Where corrective measures are completed that permit operation in accordance with the LCO or ACTIONS, completion of the actions required by LCO 3.0.3 is not required.

LCO 3.0.3 is only applicable in MODES 1, 2, 3, and 4.

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**ATTACHMENT (2)**

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**TECHNICAL SPECIFICATION BASES MARKUP -  
FOR INFORMATION ONLY**

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B 3.0 LIMITING CONDITION FOR OPERATION (LCO) AND SURVEILLANCE  
REQUIREMENT (SR) APPLICABILITY

B 3.0 Limiting Condition For Operation (LCO) Applicability

BASES

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LCOs

(8)  
LCO 3.0.1 through LCO 3.0.7 establish the general requirements applicable to all Specifications and apply at all times, unless otherwise stated.

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LCO 3.0.1

LCO 3.0.1 establishes the Applicability statement within each individual Specification as the requirement for when the LCO is required to be met (i.e., when the plant is in the MODES or other specified conditions of the Applicability statement of each Specification).

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LCO 3.0.2

LCO 3.0.2 establishes that upon discovery of a failure to meet an LCO, the associated ACTIONS shall be met. The Completion Time of each Required Action for an ACTIONS Condition is applicable from the point in time that an ACTIONS Condition is entered. The Required Actions establish those remedial measures that must be taken within specified Completion Times when the requirements of an LCO are not met. This Specification establishes that:

- a. Completion of the Required Actions within the specified Completion Times constitutes compliance with a Specification; and
- b. Completion of the Required Actions is not required when an LCO is met within the specified Completion Time, unless otherwise specified.

Specification 5.5.14, "Safety Function Determination Program (SFDP)," ensures loss of safety function is detected and appropriate actions are taken. Upon entry into LCO 3.0.6, an evaluation shall be made to determine if loss of safety function exists. Additionally, other limitations, remedial actions, or compensatory actions may be identified as a result of the support system inoperability and corresponding exception to entering supported system Conditions and Required Actions. The SFDP implements the requirements of LCO 3.0.6.

Cross train checks to identify a loss of safety function for those support systems that support multiple and redundant safety systems are required. The cross train check verifies that the supported systems of the redundant OPERABLE support system are OPERABLE, thereby ensuring safety function is retained. If this evaluation determines that a loss of safety function exists, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

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LCO 3.0.7

There are certain special tests and operations required to be performed at various times over the life of the plant. These special tests and operations are necessary to demonstrate select plant performance characteristics, to perform special maintenance activities, and to perform special evolutions. Test Exception LCO 3.1.8, "PHYSICS TEST Exceptions - MODE 2," allows specified Technical Specification (TS) requirements to be changed to permit performances of special tests and operations, which otherwise could not be performed if required to comply with the requirements of these TS. Unless otherwise specified, all other TS requirements remain unchanged. This will ensure all appropriate requirements of the MODE or other specified condition not directly associated with or required to be changed to perform the special test or operation will remain in effect.

The Applicability of a Test Exception LCO represents a condition not necessarily in compliance with the normal requirements of the TS. A special operation may be performed either under the provisions of the appropriate Test Exception LCO or under the other applicable TS requirements. If it is desired to perform the special operation under the provisions of the Test Exception LCO, the requirements of the Test Exception LCO shall be followed.

Insert LCO 3.0.8 →

## Insert

### LCO 3.0.8

LCO 3.0.8 establishes conditions under which systems are considered to remain capable of performing their intended safety function when associated snubbers are not capable of providing their associated support function(s). This LCO states that the supported system is not considered to be inoperable solely due to one or more seismic snubbers not capable of performing their associated support function(s). This is appropriate because a limited length of time is allowed for maintenance, testing, or repair of one or more seismic snubbers not capable of performing their associated support function(s) and appropriate compensatory measures are specified in the snubber requirements, which are located outside of the Technical Specifications (TS) in the Snubber Inspection and Testing Program document. The snubber requirements do not meet the criteria in 10 CFR 50.36(c)(2)(ii), and, as such, are appropriate for control by the Snubber Program.

If the allowed time expires and the snubber(s) are unable to perform their associated support function(s), the affected supported system's LCO(s) must be declared not met and the Conditions and Required Actions entered in accordance with LCO 3.0.2.

LCO 3.0.8.a applies when one or more seismic snubbers are not capable of providing their associated support function(s) to a single train or subsystem of a multiple train or subsystem supported system or to a single train or subsystem supported system. LCO 3.0.8.a allows 72 hours to restore the snubber(s) before declaring the supported system inoperable. The 72 hour Completion Time is reasonable based on the low probability of a seismic event concurrent with an event that would require operation of the supported system occurring while the snubber(s) are not capable of performing their associated support function and due to the availability of the redundant train of the supported system.

LCO 3.0.8.b applies when one or more seismic snubbers are not capable of providing their associated support function(s) to more than one train or subsystem of a multiple train or subsystem supported system. LCO 3.0.8.b allows 12 hours to restore the snubber(s) before declaring the supported system inoperable. The 12 hour Completion Time is reasonable based on the low probability of a seismic event concurrent with an event that would require operation of the supported system occurring while the snubber(s) are not capable of performing their associated support function.

LCO 3.0.8 requires that risk be assessed and managed. Industry and NRC guidance on the implementation of 10 CFR 50.65(a)(4) (the Maintenance Rule) does not address seismic risk. However, use of LCO 3.0.8 should be considered with respect to other plant maintenance activities, and integrated into the existing Maintenance Rule process to the extent possible so that maintenance on any unaffected train or subsystem is properly controlled, and emergent issues are properly addressed. The risk assessment need not be quantified, but may be a qualitative awareness of the vulnerability of systems and components when one or more seismic snubbers are not able to perform their associated support function.