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June 16, 2008

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 Additional Information Pertaining to License Amendment  
Request Submitted in Accordance with TSTF-448, Revision 3, on August 16,  
2007

Reference 1: Letter to USNRC Document Control Desk from John Carlin, Application to Revise Technical Specifications Regarding Control Room Envelope Habitability in Accordance With TSTF-448, Revision 3, Using the Consolidated Line Item Improvement Process, dated August 16, 2007

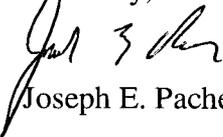
Reference 2: Letter to John Carlin from Douglas Picket (NRC), Request for Additional Information Re: Control Room Habitability – R.E. Ginna Nuclear Power Plant (TAC No. MD6679), dated January 8, 2008

On August 16, 2007, R. E. Ginna Nuclear Power Plant, LLC submitted a request for an amendment to the Ginna Technical Specifications (Reference 1) in accordance with TSTF-448. On January 8, 2008 the NRC responded to that request with a request for additional information (Reference 2). The enclosure to this letter contains a response to that request for additional information and a revised markup for the proposed change to Technical Specification 5.5.16.

In accordance with 10 CFR 50.91, a copy of this revised application is being provided to the designated New York State official.

If you should you have any questions regarding this submittal, please contact Mr. Thomas Harding at (585) 771-3384 or [Thomas.Harding@Constellation.com](mailto:Thomas.Harding@Constellation.com).

Sincerely,

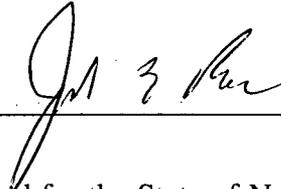
  
Joseph E. Pacher

A001  
A102  
NRR

1001926

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

I, Joseph E. Pacher, begin duly sworn, state that I am Manager, Engineering Services, 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.

  
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Subscribed and sworn before me, a Notary Public in and for the State of New York and County of Monroe, this 16 day of June, 2008.

**WITNESS** my Hand and Notarial Seal:

  
\_\_\_\_\_

Notary Public

My Commission Expires:

12-21-10  
\_\_\_\_\_

Date

SHARON L. MILLER  
Notary Public, State of New York  
Registration No. 01M16017755  
Monroe County  
Commission Expires December 21, 20 10

JC/MR

Enclosure: Response to Request for Additional Information

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

**ENCLOSURE**

**Response to Request for Additional Information**

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1. Revised Technical Specification Section 5.5.16 Page Markups

## ENCLOSURE

### Response to Request for Additional Information

#### Request:

*Technical Specification Task Force (TSTF) TSTF-448, "Control Room Habitability," was developed for plants with pressurized control room envelopes (CREs). The R.E. Ginna Nuclear Power Plant has a non-pressurized CRE. Note that in the programs and manuals section of the standard technical specifications (STS) as modified by TSTF-448, Revision 3, paragraph (d) of section 5.5.18, "Control Room Envelope Habitability Program," specifies a differential pressure (dp) test to be conducted between performances of inleakage testing for the purpose of providing input to a periodic assessment of CRE boundary. The NRC staff recognizes that non-pressurized CREs may not be able to conduct a dp test. However, the staff believes that all plants requesting the adoption of TSTF-448 should include a method to collect data that will serve as input to a periodic assessment of the CRE boundary. This position is supported by the technical analysis section of TSTF-448, Revision 3, on page 8 where an explanation of the basis for paragraph (d) is provided. Consequently, the NRC staff is requesting that you provide a method to collect data, and an explanation of how you intend to use it to periodically assess your CRE boundary. The method should, to the extent practicable, provide information that can be used in a manner similar to the manner in which the information is to be used that is requested by paragraph (d) of section 5.5.18 of the programs and manuals section of the STS as modified by TSTF-448, Revision 3.*

#### Response:

Ginna's CRE consists of a single room with adjoining Shift Manager's office, small kitchen and a lavatory. The CRE volume is relatively small at 36,211 cubic feet. The last inleakage test indicated significant margin to the allowable leak rate. The boundary consists of both passive and active components. The passive components consist of walls, floors, roof, and penetration seals. The active components associated with the CRE are the six (6) automatic isolation dampers and the two control room personnel access doors.

As stated above, Ginna does not have the capability to perform a pressure test because of its neutral pressure design. In lieu of a pressurization test, Ginna conducts preventative maintenance (PM) and surveillance activities which give assurance that the boundary is maintained in a manner that will provide protection for the operators. These requirements are currently controlled under other plant programs, but will be included as appropriate in the new Control Room Habitability Program. Any criteria that are not met while performing these activities are documented and resolved in accordance with the Ginna Corrective Action Program (CAP). Appropriate actions are identified and implemented to restore the degraded conditions and assess impact on the CRE boundary. The information captured by the CAP will be used in future periodic assessments of the CRE. These processes ensure that the Ginna CRE boundary

## **ENCLOSURE**

### **Response to Request for Additional Information**

can perform its safety function comparable to performing a pressurization test and trending the test data.

Attachment (1) provides a revised markup of proposed Technical Specification 5.5.16 that includes a new section (d). Please replace the proposed Technical Specification 5.5.16 in Reference (1) with the revised mark-up provided in Attachment (1) of this letter. No Technical Specification Bases are provided for this section. This additional information does not alter the No Significant Hazards Determination provided in Reference (1).

**Attachment 1**

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**Revised Technical Specification Section 5.5.16 Page Markups**

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## Revised Technical Specification Section 5.5.16 Page Markups

5.5.16

### Control Room Envelope Habitability Program

A Control Room Envelope (CRE) Habitability Program shall be established and implemented to ensure that CRE habitability is maintained such that, with an OPERABLE Control Room Emergency Air Treatment System (CREATS), CRE occupants can control the reactor safely under normal conditions and maintain it in a safe condition following a radiological event, hazardous chemical release, or a smoke challenge. The program shall ensure that adequate radiation protection is provided to permit access and occupancy of the CRE under design basis accident (DBA) conditions without personnel receiving radiation exposures in excess of 5 rem total effective dose equivalent (TEDE) for the duration of the accident. The program shall include the following elements:

- a. The definition of the CRE and the CRE boundary.
- b. Requirements for maintaining the CRE boundary in its design condition including configuration control and preventive maintenance.
- c. Requirements for (i) determining the unfiltered air inleakage past the CRE boundary into the CRE in accordance with the testing methods and at the Frequencies specified in Sections C.1 and C.2 of Regulatory Guide 1.197, "Demonstrating Control Room Envelope Integrity at Nuclear Power Reactors," Revision 0, May 2003, and (ii) assessing CRE habitability at the Frequencies specified in Sections C.1 and C.2 of Regulatory Guide 1.197, Revision 0.
- d. Licensee controlled programs that will be used to verify the integrity of the CRE boundary. Conditions that generate relevant information from those programs will be entered into the corrective action process and shall be trended and used as part of the 36 month assessments of the CRE boundary.
- e. The quantitative limits on unfiltered air inleakage into the CRE. These limits shall be stated in a manner to allow direct comparison to the unfiltered air inleakage measured by the testing described in paragraph c. The unfiltered air inleakage limit for radiological challenges is the inleakage flow rate assumed in the licensing basis analyses of DBA consequences. Unfiltered air inleakage limits for hazardous chemicals must ensure that exposure of CRE occupants to these hazards will be within the assumptions in the licensing basis.

## **Revised Technical Specification Section 5.5.16 Page Markups**

- f. The provisions of SR 3.0.2 are applicable to the Frequencies for assessing CRE habitability and determining CRE unfiltered inleakage as required by paragraph c.