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March 20, 2009

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 Associated
With Relief Request Number 22**

- References:
- (1) Letter from J. Pacher, Ginna LLC, to NRC Document Control Desk, Subject: First Interval IWE/IWL Containment Program Submittal of Relief Request Number 22, dated November 21, 2008.
 - (2) Letter from D. Pickett, NRC, to J. Carlin, Ginna LLC, Subject: Request for Additional Information Re: First Interval IWE/IWL Containment Program Relief Request Number 22 – R.E. Ginna Nuclear Power Plant (TAC No. ME0154), dated February 9, 2009.

In Reference 1, R.E. Ginna Nuclear Power Plant, LLC (Ginna LLC) submitted a relief request associated with the IWE/IWL Containment Program. On February 9, 2009 the NRC responded to that submittal with a request for additional information (Reference 2). Enclosed please find the responses to the staff's questions.

No new commitments are being made in this letter.

If you should have any questions regarding this submittal, please contact David Wilson at (585) 771-5219.

Very truly yours,

A handwritten signature in black ink, appearing to read "JEP" with a stylized flourish.

Joseph E. Pacher

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NR2

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cc: S. J. Collins, NRC
D. V. Pickett, NRC
Resident Inspector, NRC

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**Response to Request for Additional Information Associated With
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Question 1

Considering the approximately 16-month extension of the first Containment Inservice Inspection (CISI) interval requested in the Reference relief request, provide the following information:

- (a) *The proposed start and end dates and code of record for the next (second) 120-month CISI interval, covering IWE and IWL inspections, that would align with the next ISI interval.*

Response:

The start date of the Second 120-Month Containment ISI Interval is January 1, 2010 and the end date for the Second CISI Interval for IWE and IWL is December 31, 2019. The code of record for the Second CISI Interval for IWE and IWL will be the 2004 Edition of ASME Section XI

- (b) *The approximate date(s) of the last refueling outage/cycle, as pertinent, in which all the required IWE and IWL inspections for the current (first) CISI interval were completed, as stated in the relief request.*

Response:

All remaining examinations for the First CISI Interval for IWE and IWL were completed at the conclusion of the 2008 refueling outage (March 2008).

- (c) *The approximate date(s) of the first refueling outage/cycle, as pertinent, in which IWE and IWL inspections for the next (second) CISI interval are proposed to begin.*

Response:

The first refueling outage in the Second CISI Interval for IWE and IWL is scheduled for the spring of 2011.

- (d) *Indicate if there will be any refueling outages between the two outages referred to in items (b) and (c) above and the plan for IWE/IWL inspections, if any, for that outage. Indicate the interval to which these inspections, if any, will be credited.*

Response:

There is one refueling outage scheduled for the fall of 2009. This outage will be credited to the current Containment Interval (First CISI Interval for IWE and IWL). There are currently no examinations for IWE or IWL scheduled for the fall of 2009 outage.

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Question 2

Provide the highlights of the findings of the recent IWE and IWL examinations (required by the CISI program) during the first CISI interval and their disposition. Indicate if there are any areas requiring/undergoing augmented examination and how they are being implemented, if applicable.

Response:

All examinations required by ASME Section XI Code 1992 Edition, 1992 Addenda, and as modified by approved Relief Requests and 10 CFR 50.55a were completed at the conclusion of the 2008 refueling outage in March of 2008. The highlights of the findings from the examinations are below:

ASME Section XI Code Examination Category E-A, Item Number E1.11

Component Name

Sump "A" Liner, ISI Summary Number - I 900002

History

- 2003 - Light to medium rust noted on wall. Heavy rust noted on the North wall corner – Reject. Weld Repair to North wall corner, Post Repair/Repaint exams performed (VT & UT) –Acceptable
- 2005 - Failed coating- cleaned, then UT - Acceptable under exam record N05442
- 2006 - Failed coating- cleaned, then VT & UT – Acceptable (see augmented exams)
- 2008 - Performed VT -3 under ISI Summary Number I 900602 - Acceptable

Component Name

Penetration 29 Transfer Tube Liner, ISI Summary Number - I 900006

History

- 1999 - Transfer Tube Liner has possible leak northeast corner – Reject. Performed controlled leakage exam – no leaks found. Rust blistering on liner 4" to 6" off the floor and along Penetration 29 outer weld within 1" to 2" of approximately 50% of the perimeter of the weld. Bolting removed and examined – Acceptable.

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- 2000 - No recordable indications – completion of 1999 exam
- 2003 - General Visual – Acceptable
- 2008 - VT-1 performed under ISI Summary Number - I 901001 - Acceptable

ASME Section XI Code Examination Category E-A, Item Number E1.12:

Component Name

Penetration 201, ISI Summary Number - I 900686

History

- 2008 - VT-3 outside containment, rust on face of penetration and weld to process pipe - Reject.
Cleaned, VT-1 and UT - Acceptable, VT-3 after applied coating – Acceptable

Component Name

Penetration 316, ISI Summary Number - I 900732

History

- 2008 - VT-3 outside containment, rust on face of penetration and weld to process pipe - Reject.
Cleaned, VT-1 and UT - Acceptable, VT-3 after applied coating – Acceptable

Component Name

Penetration 319, ISI Summary Number - I 900738

History

- 2008 - VT-3 outside containment, rust on face of penetration and weld to process pipe - Reject.
Cleaned, VT-1 and UT - Acceptable, VT-3 after applied coating – Acceptable

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Component Name

Penetration 320, ISI Summary Number - I 900740

History

- 2008 - VT-3 outside containment, rust on face of penetration and weld to process pipe - Reject. Cleaned, VT-1 and UT - Acceptable, VT-3 after applied coating – Acceptable

ASME Section XI Code Examination Category L-B, Item Number L2.30:

Component Name

Tendon # 73, ISI Summary Number I 954073

History

- 2006 - VT-1 Button Heads – 5 w/splits < 0.060". Sacrificial wire in spacer tube. Hardware/Shims – Acceptable. Dent in Anchor Head top surface – Acceptable. Bearing surface – pitting at gasket surface < 1/64" – Acceptable. Tension Test < Minimal. Condition Report 2005-5212 generated. ¼" shim added. VT-1C: 2 cracks at 6:00 and 8:00 position < 0.010" – Acceptable. Tendon # 74 added to scope and found Acceptable.

ASME Section XI Code Examination Category E-C, Item Number E4.11: (Augmented Examinations)

Component Name

Sump A Liner, ISI Summary Number I 901002

History

- 2003 - Reject – Code Weld Repair performed on North Wall corner. VT-1 – Acceptable.
- 2006 - VT-1 - Acceptable

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Component Name

Penetration 29 Area (Penetration 29, 35 Feet West of Penetration 29 and 30 Feet East of Penetration 29), ISI Summary Number I 901001

History

- 2005 - VT-1; Penetration 29 Area, 30 Feet East of Penetration 29 and 35 Feet West of Penetration 29 – All Acceptable.
- 2008 - VT-1; Penetration 29 Area, 30 Feet East of Penetration 29 and 35 Feet West of Penetration 29 – All Acceptable.

ASME Section XI Code Examination Category E-C, Item Number E4.12: (Augmented Examinations)

Component Name

Sump A Liner, ISI Summary Number I 901502

History

- 2003 - Reject – Code Weld Repair performed on North Wall corner. UT after Repair - Acceptable.
- 2006 - UT: Readings range from 0.245" to 0.330". All Acceptable.

Component Name

Penetration 29 Area (Penetration 29, 35 Feet West of Penetration 29 and 30 Feet East of Penetration 29), ISI Summary Number I 901501

History

- 2005 - UT; Penetration 29 Area- Lowest Reading 0.334" – Acceptable. 30 Feet East of Penetration 29 area- Lowest Reading 0.356" - Acceptable. 35 Feet West of Penetration 29 area - Lowest Reading 0.370" - Acceptable.
- 2008 - UT; Penetration 29 area, 30 Feet East of Penetration 29 area and 35 Feet West of Penetration 29 area – All Acceptable and above 0.300"

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Question 3

Note 1 in Section 1 "ASME Code Component(s) Affected" of the Relief Request states that: "Applicability to Subsection IWL is limited to the referencing of the Code of Record in program documents and to the update of program procedures to the new Code requirements. Subsection IWL inspection frequencies will remain unchanged." Explain and clarify the meaning and implication of the note in the context of the relief request applicable to the first CISI interval, which under the original interval plan ended on September 8, 2008, and already had a code of record with program procedures and inspection frequencies in accordance with that code of record.

Response:

The intent of the statement was to clarify that the inspection frequencies in place would not be changed by changing the interval date for the Second Containment ISI Interval to coincide with the start and end date of the Fifth ISI Interval. For example the requirement to perform tendon examinations at five year frequencies would be based on the date last performed (plus or minus one-year) and not based on the new interval's start date. There is no impact to the First Containment ISI Interval Code of Record. This statement applies to the Second Containment ISI Interval Code of Record only.