

#### UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D.C. 20555-0001

October 6, 2009

Mr. John T. Carlin Vice President R.E. Ginna Nuclear Power Plant R.E. Ginna Nuclear Power Plant, LLC 1503 Lake Road Ontario, NY 14519

# SUBJECT: REQUEST FOR ADDITIONAL INFORMATION (RAI) RE: RELIEF REQUEST NO. PR-01, REVISION 0, FOR THE FIFTH 10-YEAR INSERVICE TESTING INTERVAL - R.E. GINNA NUCLEAR POWER PLANT (TAC NO. ME2239)

Dear Mr. Carlin:

By letter dated September 11, 2009, R.E. Ginna Nuclear Power Plant, LLC (the licensee) submitted Relief Request (RR) PR-01 for the fifth 10-year inservice testing interval. The request pertains to proposed alternative testing from the inservice testing requirements of the American Society of Mechanical Engineers (ASME) Operation and Maintenance Code. The Nuclear Regulatory Commission staff has reviewed the information and identified that additional information is needed to complete the review for RR PR-01, Revision 0. The staff's RAI is enclosed.

As discussed with your staff, we understand that you intend to respond to this RAI by October 23, 2009.

Please contact me at 301-415-1364 if you have any questions.

Sincerely,

Dougla V Pichett

Douglas V. Pickett, Senior Project Manager Plant Licensing Branch I-1 Division of Operating Reactor Licensing Office of Nuclear Reactor Regulation

Docket No. 50-244

Enclosure: As stated

cc w/encl: Distribution via Listserv

# REQUEST FOR ADDITIONAL INFORMATION

# RELIEF REQUEST (RR) NO. PR-01

# FOR THE INSERVICE TESTING PROGRAM FIFTH 10-YEAR INTERVAL

## R.E. GINNA NUCLEAR POWER PLANT

# DOCKET NO. 50-244

By letter dated September 11, 2009, R.E. Ginna Nuclear Power Plant, LLC requested approval of alternative testing associated with the inservice testing (IST) program fifth 10-year interval. The Nuclear Regulatory Commission (NRC) staff is reviewing the submittal and has the following questions:

### RR PR-01, Revision 0:

1) Proposed alternative request PR-01 discusses the testing involved with diesel fuel oil transfer pumps (PDG02A & PDG02B). The diesel fuel oil transfer pumps are required to transfer fuel oil from the storage tank to the day tank to ensure a continuous fuel supply to support long-term operation of the diesel during accident conditions.

Testing is to be completed following the requirements of American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (OM Code) 2004 Edition, No Addenda. RR PR-01 identified that ASME OM Code requirement ISTB-3550, "Flow Rate", could not be met as stated due to the fact that there is no installed instrumentation for direct flow rate measurement of the diesel fuel oil transfer system. The proposed alternative for measuring diesel fuel oil transfer system flow rate is completed by observing the rate of change in the diesel generator day tanks as they are being filled using a graduated sight glass located on the day tank. Flow rate is determined by calculation of day tank level increase vs. time utilizing the accuracy as described in design analysis EWR 4526-ME-20.

### Discussion:

NUREG-1482, Revision 1, "Guidelines for Inservice Testing at Nuclear Power Plants," Section 5.5.2, "Use of Tank Level to Calculate Flow Rate for Positive Displacement Pumps," provides recommendations for this type of application. If the licensee uses tank level to calculate the flow rate as described in Subsection ISTB-3550, the implementing procedure must include the calculational method and any test conditions needed to achieve the required accuracy. Specifically, the licensee must verify that the reading scale for measuring the tank level and the calculational method yield an accuracy within ±2 percent for Group A and B tests, and Preservice and Comprehensive Tests. Question:

It is the NRC staff's understanding that the diesel fuel oil transfer pumps PDG02A and PDG02B are positive displacement pumps. Please explain how the proposed alternative testing methodology utilizing the accuracy in design analysis EWR 4526-ME-20 meets the recommendations as described in NUREG-1482, Revision 1, Section 5.5.2

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Sincerely, /**RA**/ Douglas V. Pickett, Senior Project Manager Plant Licensing Branch I-1 Division of Operating Reactor Licensing Office of Nuclear Reactor Regulation

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