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

May 10, 2010

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 REGARDING REQUEST TO IMPLEMENT ASME CODE CASE N-716 – R.E. GINNA NUCLEAR POWER PLANT (TAC NO. ME3013)

Dear Mr. Carlin:

By letter dated December 30, 2009, R.E. Ginna Nuclear Power Plant, LCC submitted the proposed Fifth 10-Year Inservice Inspection Plan for the R.E. Ginna Nuclear Power Plant. This submittal included a request to implement American Society of Mechanical Engineers Code Case N-716, "Risk-Informed/Safety-Based Inservice Inspection Program Plan."

The Nuclear Regulatory Commission staff has reviewed the information provided and has determined that additional information is needed to complete its review. Enclosed is the staff's request for additional information (RAI). As discussed with your staff, we understand that you intend to respond to this RAI within 45 days of the date of this letter.

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

Sincerely,

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

IMPLEMENTATION OF ASME CODE CASE N-716

R.E. GINNA NUCLEAR POWER PLANT

DOCKET NO. 50-244

By letter dated December 30, 2009, R.E. Ginna Nuclear Power Plant LLC (the licensee), requested an alternative to Section XI of the American Society of Mechanical Engineers (ASME) Code for Inspection Program B by proposing a risk informed/safety based inservice inspection (ISI) program (RIS_B) for examination Category B-F, B-J, C-F-1, and C-F-2, Class 1 and 2 piping components in accordance with ASME Code Case N-716, "Risk-Informed/Safety-Based Inservice Inspection Program Plan," at the R.E. Ginna Nuclear Power Plant. The duration of the request is for the fifth 10-year ISI interval which began January 1, 2010, and concludes December 31, 2019.

The Nuclear Regulatory Commission (NRC) staff has reviewed and evaluated the information provided by the licensee and has determined that the following information is needed in order to complete its review of request for alternative ISI-01.

1. Section 1.2 of the Request for Alternative, ISI-01, states "The updated PRA [probabilistic risk assessment] model meets the Capability Category II supporting requirements (SRs) and combined Category II and Category III SRs where both requirements are equivalent (e.g., SR IF-D5a)." The status of SRs that have no capability category differentiation are either "met" or "not met" and are not discussed. The quoted statement seems to be inconsistent with the following in Attachment A under the section titled PRA Peer Review: "The Peer Review resulted in 25 findings. All of the findings that could impact Risk-Informed ISI have been incorporated into the PRA Model 7.0." This statement suggests that findings that would not impact the RI-ISI program have not been incorporated. The appendix also discusses the Configuration Risk Management Program (CRMP) that appears to address facility changes with respect to the PRA and not changes due to peer review findings.

   A. Please identify any SRs that are "not met" in the 2009 peer review.

   B. Please provide information that describes how the R.E. Ginna Nuclear Power Plant PRA addresses SRs that span all three capability categories.

   C. Please clarify if CRMP is a configuration control tool or PRA model quality management program and describe how it is used to detect modeling inconsistencies with Capability Category II of the American Society of Mechnical Engineers Standard.

Enclosure

2. Were new examination locations identified? Using an upper-bound estimate for new locations would be non-conservative. Please demonstrate that correcting any non-conservative estimates arising from new locations would not cause the delta risk guidelines to be exceeded.

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Sincerely,
/RA/
Douglas V. Pickett, Senior Project Manager
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