

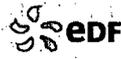
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June 22, 2010

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 Request to Implement ASME Code Case N-716**

- References:**
- (1) Letter from P. Swift, Ginna LLC, to NRC Document Control Desk, Subject: Fifth Ten-Year Inservice Inspection Plan and Request for Approval of Alternative (Relief Request) to American Society of Mechanical Engineers Code, Section XI, dated December 30, 2009.
 - (2) Letter from D. Pickett, NRC, to J. Carlin, Ginna LLC, Subject: Request for Additional Information Regarding Request to Implement ASME Code Case N-716 – R.E. Ginna Nuclear Power Plant (TAC NO. ME3013), dated May 10, 2010.

On December 30, 2009 R.E. Ginna Nuclear Power Plant, LLC (Ginna LLC) submitted a request for approval for implementation of a risk-informed/safety based inservice inspection program for Class 1 and 2 piping based on ASME Code Case N-716 (Reference 1). On May 10, 2010 the NRC responded to that submittal with a request for additional information (Reference 2). Enclosed please find the response to the staff's question.

There are no regulatory commitments contained in this letter. Should you have questions regarding this matter, please contact Thomas Harding (585) 771-5219, or thomas.hardingjr@cengllc.com.

Very truly yours,

Paul M. Swift

Attachment: Response to Request for Additional Information Associated With Request to Implement ASME Code Case N-716

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

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Question

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 RiskInformed 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.

Response:

The CRMPs listed in Attachment A of our original submittal identify the SR requirements associated with each finding when initially entered into our CRMP database at the time of the Ginna Peer Review (i.e. June 2009). The final peer review report issued in August of 2009 contains a summary table of the Capability Category for the supporting level requirements.

Table 4-1
Summary of Capability Category Assessment by PRA Element

SR	Capability Category								TOTAL
	Not Met	Met	CC-I	CC-II	CC-III	CC-I/II	CC-II/III	N/A	
Initiating Event (IE) TOTAL	2	18	0	5	0	5	0	3	33
Accident Sequence Analysis (AS) TOTAL	0	18	0	1	0	1	0	1	21
Success Criteria (SC) TOTAL	0	10	1	1	0	0	1	1	14
Systems Analysis (SY) TOTAL	0	35	0	3	0	1	3	0	42
Human Reliability (HR) TOTAL	3	20	0	3	1	2	6	0	35
Data Analysis (DA) TOTAL	0	21	0	7	0	2	4	0	34
Internal Flooding (IF) TOTAL	9	31	2	2	0	1	0	5	50
Quantification (QU) TOTAL	1	27	1	2	0	0	3	1	35
Large Early Release Frequency (LE) TOTAL	0	19	3	17	0	0	2	1	42
Maintenance & Update/Configuration Control (MU) TOTAL	1	9	0	0	0	0	0	0	10
GRAND TOTALS	16	208	7	41	1	12	19	12	316

This identifies 16 SR requirements that were considered "not met." The specific SRs considered "not met" are: IE-C10, IE-C13, HR-G3, HR-I1, HR-I2, IF-B2, IF-C3, IF-C8, IF-D6, IF-D7, IF-E3a, IF-F1, IF-F2, IF-F3, QU-B5, MU-D1.

For an SR to be considered "not met", the SR must have one or more findings. Each finding was dispositioned in Attachment A of our original submittal. For example, the finding related to IE-C10 was entered into our database as CRMP 845. In some cases, a finding can cause

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multiple SRs to be considered "not met." The finding associated with SRs HR-11 and HR-12 was assigned to CRMP 802.

As the findings are the specific issues that describe why a SR is "not met", addressing the findings labeled as CRMP ensures that the ISI evaluation satisfies the quality requirement.

Question

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

Response:

A SR that spans all three capability categories is treated the same as a SR that has a different requirement for each capability category. Our PRA documentation is organized such that the documentation aligns with the ASME/ANS standard. The basis for achieving a capability category is provided in a matrix in each notebook. For each SR, the matrix states the section within the notebook where the basis for compliance is located.

Question

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 Mechanical Engineers Standard.

Response:

The CRMP database is a configuration control tool used to store all open items against the PRA model. Each open item is assigned a CRMP number. Each finding against supporting requirements (SRs) of the ASME/ANS Standard, identified during the June 2009 peer review process, was assigned as an open CRMP item. Each CRMP item contains an array of information such as a title, description of the issue, resolution, estimated impact, compensatory actions required, and which internal events SR is impacted by the issue. The database is then used to assess the quality of the Ginna PRA for each risk-informed application, as described below.

Each application requires us to review each open CRMP item in the database and assess the impact of the item on the application. You will notice that four of the CRMP items listed in Attachment A of our original submittal (items 699, 702, 768, and 856) were not associated with a finding (i.e. they were self-identified), but had the potential to affect the evaluation. Since all peer review findings were entered into the CRMP database, these findings were assessed for impact on the application.

A disposition of all the CRMP items that could affect ISI at the time of submittal was provided in Attachment A of our original submittal. Since none of the open CRMP items (including peer

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review findings) had an impact on the ISI submittal, it was concluded that the Ginna PRA is of sufficient quality to support the submittal. Those CRMP items that could impact the submittal (including all SRs which did not meet Capability Category II of the ASME/ANS Standard) were resolved (i.e. closed and incorporated into the model) prior to issuing the submittal.

Question

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

Response:

There were new locations added. The following is stated in template Section 3.4.1:

Also, for cases where the RIS_B selections exceeded SXI selections in Table 3.4, they were set equal to SXI to confirm that the use of conservative CCDP and CLERP are not non conservative relative to meeting the acceptance criteria.

To clarify, certain CVCS, RC and RHR entries in Table 3.4 indicate RIS_B selections greater than SXI (Delta column has a positive number). These entries were revised by setting the positive Delta values to zero. This conservative change in risk sensitivity calculation was performed in lieu of a lower bound calculation to show that the acceptance criteria is met with the use of conservative CCDP and CLERP and that the number of RIS_B selections are not allowed to exceed SXI.