



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

April 25, 2011

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: CLOSEOUT OF GENERIC LETTER 2008-01 "MANAGING GAS
ACCUMULATION IN EMERGENCY CORE COOLING, DECAY HEAT
REMOVAL, AND CONTAINMENT SPRAY SYSTEMS" - R.E. GINNA NUCLEAR
POWER PLANT (TAC NO. MD7830)

Dear Mr. Carlin:

On January 11, 2008 (Agencywide Documents Access and Management System Accession No. ML072910759), the Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems." The stated purpose of GL 2008-01 was (a) to request addressees to submit information to demonstrate that the subject systems are in compliance with the current licensing and design bases and applicable regulatory requirements, and that suitable design, operational, and testing control measures are in place for maintaining this compliance; and (b) to collect the requested information to determine if additional regulatory action is required.

GL 2008-01 requested that licensees provide the following information within 9 months of the date of the GL:

- (a) A description of the results of evaluations that were performed pursuant to requested actions specified in the GL. This description should provide sufficient information to demonstrate that you are or will be in compliance with the quality assurance criteria in Sections III, V, XI, XVI, and XVII of Appendix B to Title 10 of the *Code of Federal Regulations* Part 50 and the licensing basis and operating license as those requirements apply to the subject systems;
- (b) A description of all corrective actions, including plant, programmatic, procedure, and licensing basis modifications that you determined were necessary to assure compliance with these regulations; and,
- (c) A statement regarding which corrective actions were completed, the schedule for completing the remaining corrective actions, and the basis for that schedule.

By letter dated October 13, 2008 (ML082910042), R.E. Ginna Nuclear Power Plant, LLC, the licensee for Ginna, provided their 9-month response to GL 2008-01. In addition, by letter dated March 2, 2011 (ML110670421), the licensee responded to the NRC staffs request for additional information (RAI).

The following discussion provides the NRC staff's evaluation of the licensee's RAI responses:

Question 1 addressed operability concerns related to gas accumulation. The licensee maintains a Gas Intrusion Management Program. This program includes periodic ultrasonic test examinations, pressure trending, and required entry into the corrective action process (CAP) if gas is discovered. The NRC staff concludes that this provides an acceptable response to the question.

Question 2 addressed the evaluation, tracking, and trending of identified voids. Identified voids are entered into the CAP for further evaluation. The source of the gas is determined in order to decide if more inspections or other corrective actions are necessary. Reasonable efforts are made to remove gas when it is discovered. The program owner keeps track of trending and tracking. The NRC staff concludes that this provides an acceptable response to the question.

Question 3 addressed the basis for void acceptance criteria. The licensee stated that they use standard industry methods to define acceptance criteria including the table of pump suction void fraction criteria from NEI 09-10 Revision 1, "Guidelines for Effective Prevention and Management of System Gas Accumulation." The licensee acknowledges that slug flow is unacceptable and uses standard industry methods to preclude slug flow including the 0.5 second test in section 4 of NRC guidance to inspectors and the simplified equation. The NRC staff concludes that this provides an acceptable response to the question.

Question 4 addressed training. The licensee states that operations and engineering training programs include initial and continuing training on concerns related to GL 2008-01. The NRC staff concludes that this provides an acceptable response to the question.

The NRC staff concludes that the licensee has adequately demonstrated "that gas accumulation is maintained less than the amount that challenges operability of these systems, and that appropriate action is taken when conditions adverse to quality are identified," as stated in GL 2008-01. The staff continues to engage stakeholders regarding the creation of durable guidance for Gas Management which may require additional actions by the licensee beyond the scope of GL 2008-01.

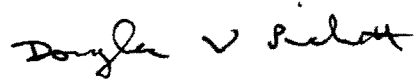
Consequently, your GL response is considered closed and no further information or action is requested of you with the exception of any commitments you have made with respect to the GL responses. Notwithstanding, the NRC's Region I staff has scheduled an inspection using Temporary Instruction (TI) 2515/177, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems (NRC Generic Letter 2008-01)" (ADAMS Accession No. ML082950666). TI 2515/177 is confirmatory in nature in that it directs NRC inspectors to selectively verify that the licensee has implemented or is in the process of acceptably implementing the commitments, modifications, and programmatically controlled actions described in the licensee's response to GL 2008-01 and the plant-specific information supports a conclusion that subject systems operability is reasonably ensured.

J. Carlin

- 3 -

If you have any questions regarding this letter, please call me at (301) 415-1364.

Sincerely,

A handwritten signature in black ink, reading "Douglas V. Pickett". The signature is written in a cursive style with a large, stylized 'D' and 'P'.

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

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J. Carlin

- 3 -

If you have any questions regarding this letter, please call me at (301) 415-1364.

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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