

**John Carlin**  
Site Vice President

# CENG

a joint venture of



**Constellation  
Energy**



**edf**

R.E. Ginna Nuclear Power Plant, LLC  
1503 Lake Road  
Ontario, New York 14519-9364

585.771.5200  
585.771.3943 Fax

[john.carlin@cengllc.com](mailto:john.carlin@cengllc.com)

April 25, 2011

U. S. Nuclear Regulatory Commission  
Washington, DC 20555

**ATTENTION:** Document Control Desk

**SUBJECT:** **R.E. Ginna Nuclear Power Plant**  
Docket No. 50-244

**Commitment Change Associated with the Pressure at which to Perform Two Structural Integrity Tests During Period of Extended Operation**

- References:
- (1) U.S. NRC, Safety Evaluation Report, "Related to the License Renewal of R.E. Ginna Nuclear Power Plant," NUREG-1786, May 2004. (ML041400502)
  - (2) Letter from R. C. Mecredy, RG&E, to NRC Document Control Desk, Subject: RAI Response Clarifications and Commitment Schedule Update, dated July 30, 2003. (ML032180454)
  - (3) U.S. NRC, Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program," dated September 1995. (ML003740058)
  - (4) ANS, "American National Standard for Containment System Leakage Testing Requirements," ANSI/ANS-56.8-1994, August 4, 1994.

In May 2004, the NRC issued the Safety Evaluation Report NUREG-1786 regarding the License Renewal of the R.E. Ginna Nuclear Power Plant (Reference 1). On p. 3-250 of the aforementioned report, the NRC found that the applicant's commitment to perform two Structural Integrity Tests (SITs) in conjunction with Integrated Leakage Rate Tests (ILRTs) during the extended period of operation as described in letter dated July 30, 2003, from RG&E to the NRC (Reference 2), to be acceptable. NUREG-1786, p. A-4, and the letter dated July 30, 2003, p. 8, described the commitment as performing the two SITs at the design pressure of the containment.

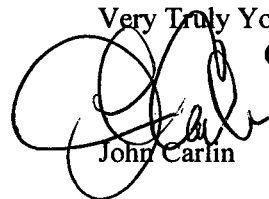
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The R.E. Ginna Nuclear Power Plant, LLC (Ginna LLC) Technical Specifications, Section 5.5.15, "Containment Leakage Rate Testing Program," references NRC Regulatory Guide (R.G.) 1.163 (Reference 3). In turn, R.G. 1.163 references ANS Standard ANSI/ANS-56.8-1994 (Reference 4). This latter standard specifies that a Type A ILRT be performed at a pressure that shall be no less than  $0.96 P_{ac}$  nor exceed  $P_d$ . Ginna LLC is revising the commitment to perform the two SITs in conjunction with two Type A ILRTs as set forth in R.G. 1.163 and ANSI/ANS-56.8-1994. Attachment 1 provides the revised regulatory commitment made in this letter.

If you should you have any questions regarding this submittal, please contact Mr. Thomas Harding at (585) 771-5219 or [Thomas.HardingJr@Constellation.com](mailto:Thomas.HardingJr@Constellation.com).

Very Truly Yours,



John Carlin

Attachment 1: Regulatory Commitment Revision

cc: W. M. Dean, NRC  
D. V. Pickett, NRC  
Resident Inspector, NRC

**ATTACHMENT 1**

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**Regulatory Commitment Revision**

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ATTACHMENT 1  
Regulatory Commitment Revision

The following table identifies those actions committed to by Ginna LLC in this document. Any other statements made in this licensing submittal are provided for informational purposes only and are not to be considered regulatory commitments. Please direct any questions you have in this matter to Mr. Thomas Harding at (585)771-5219.

<b>COMMITMENT</b>	<b>COMPLETION DATE</b>
Perform two structural integrity tests during period of extended operations at a pressure that is consistent with the ILRT Type A methodology set forth in R.G. 1.163.	2011 and 2021 (2026 if 15 year frequency is requested/approved)