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U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

ATTENTION: Document Control Desk

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

Report of Facility Changes, Tests, and Experiments Conducted Without Prior Commission Approval

REFERENCES:

(1) Letter from T.L. Harding, (Ginna LLC) to NRC Document Control Desk, "Commitment Change Associated with the Submittal of a Revised Pressure Temperature Limits Report," dated February 18, 2010 (ML100560032)

(2) Letter from J. Carlin, (Ginna LLC) to NRC Document Control Desk, "Commitment Change Associated with the Pressure at which to Perform Two Structural Integrity Tests During Period of Extended Operation," dated April 25, 2011 (ML11119A230)

The subject report is hereby submitted as required by 10 CFR50.59(d)(2). The enclosed report (Attachment 1) contains descriptions and summaries of the10 CFR 50.59 evaluations conducted in support of proposed changes to the facility and procedures describe in the UFSAR and special tests, from January 2010 through June 2011, performed under the provisions of 10 CFR 50.59. Also, during the period from January 2010 through June 2011, two (2) regulatory commitment changes that met the threshold for notification to the NRC when evaluated per the guidelines of NEI-99-04, "Guidelines for Managing NRC Commitment Changes" were made. Notification to the NRC of these commitment changes was made by Reference (1) and (2). No additional commitment changes met the threshold for NRC notification.

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If there are any questions regarding this submittal, please contact me at 585-771-5219 or Thomas.HardingJr@cengllc.com.

Very truly yours,

Thomas L. Harding

Attachment: (1) Report of Facility Changes, Tests, and Experiments Conducted Without Prior NRC Approval for January 2010 through June 2011.

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

bcc: J. E. Pacher
E.D. Dean
C.W. Fleming, Esquire

COMMITMENTS IDENTIFIED IN THIS CORRESPONDENCE:

- None

ATTACHMENT 1

Report of Facility Changes, Tests, and Experiments Conducted Without Prior NRC Approval for January 2010 through June 2011 under the Provision of 10 CFR 50.59

Report of Facility Changes, Tests, and Experiments Conducted Without Prior NRC Approval for January 2010 through June 2011 under the Provision of 10 CFR 50.59

50.59 Evaluation No:	2010-0001
Title of Change:	Revise Procedure RF-8.4, "Fuel and Core Component Movement in the Spent Fuel Pool"
Implementation document:	Procedure RF-8.4
UFSAR affected Sections:	No UFSAR changes required
System:	Refueling and Fuel Handling

Description of Change:

PCR-10-03718 implements changes to Procedure RF-8.4, Fuel and Core Component Movement in the Spent Fuel Pool to allow fuel assemblies to be loaded into ISFSI Dry Shielded Canisters (DSCs).

Evaluation Summary:

This 50.59 Evaluation assessed a procedure change to the main fuel movement procedure at Ginna to allow placement of fuel into a Dry Storage Canister (DSC) in the Spent Fuel Pool (SFP). The configuration of the DSC in the SFP is such that there may not be a minimum of 23' of water above an assembly dropped onto or into a DSC. Administrative controls were added to require that all fuel in the SFP have decayed for at least 70 days since last irradiation in the reactor prior to commencing DSC loading operations. An analysis, assuming no retention of radioiodine in the SFP water and that a recently irradiated assembly is inadvertently loaded into a DSC, supports that the dose consequences of a fuel handling accident with a limiting fuel assembly is bounded by the associated UFSAR fuel handling accident with this administrative control in place.

Each of the eight questions in 10 CFR 50.59(c)(2)(i) through 10 CFR 50.59(c)(2)(viii) were answered "NO" such that Nuclear Regulatory Commission permission was not required to make the change.

50.59 Evaluation No:	2010-0002
Title of Change:	Disable the Rod Control System Auto Rod Withdrawal Function
Implementation document:	ECP-2009-0015
UFSAR affected Sections:	Sections 7.2.1, 7.2.2, 7.2.5, 7.7.1, 7.7.2, 7.7.3, 15.1.2, 15.1.3, 15.1.6, 15.4.4, 15.4.6, & 15.6.1, Tables 7.7-2, 15.1-1, 15.1-3, & 15.1-7, Figures 7.7-1 & 7.7-2
System:	Control Rod Drive

Description of Change:

The rod control system auto rod withdrawal function will be disabled by de-terminating wiring to the Auto Out input in the rod control system logic cabinet. This will prevent the Auto Out (ie: rod withdrawal) relay from actuating in response to an auto rod withdrawal signal from the rod speed control circuit. This change will functionally disable the rod stops [blocks] for auto rod withdrawal. The rod drop rod stop functions from NIS [Nuclear Instrumentation System] [Power Range and Intermediate Range and from MRPI [Microprocessor Rod Position Indication] (Rod Stop P3) will become just rod drop indications [annunciators/status lights]. This will also functionally disable the P1 auto withdrawal rod stops for OTDT [Overtemperature Delta T], OPDT [Overpower Delta T] and NIS Power Range and Intermediate Range Overpower. The manual rod stops for OTDT, OPDT and NIS Overpower are unaffected by this modification. The rod stop [Average Tavg - Tavg deviation] for auto rod insertion will not be affected by this modification. The auto rod withdrawal rod stop for [Average Tavg – Tavg deviation] will be functionally disabled. The P2 rod stop for auto rod withdrawal [12.8% power] will be removed. It is no longer required since the auto rod withdrawal function will be disabled. This change in configuration will have no impact on the auto rod insertion function or on the manual rod withdrawal or rod insertion functions of the rod control system.

Existing RCS narrow range direct immersion RTDs will be replaced with new dual element direct immersion RTDS. A new 8 conductor cable will be installed in place of the existing 4 conductor cable from the RTD to the associated penetration splice box.

Evaluation Summary:

The rod control system auto rod withdrawal function will be disabled to prevent undesired rod motion due to the effects of hot leg streaming. This will prevent the control rods from withdrawing in response to an auto rod withdrawal signal from the rod speed control circuit. This change will functionally disable the rod stops [blocks] for auto rod withdrawal. There will be no impact on the auto rod insertion function or on the manual rod withdrawal or rod insertion functions of the rod control system. With the rod control system auto rod withdrawal function disabled, plant loading operation will be performed manually. Following a design basis 10% step load increase transient, the operator will bring the plant to programmed reactor coolant system temperature by manually withdrawing control rods.

The new RTDs are equivalent to the existing RTDs, with the only difference being that the new RTDs have quick disconnects installed to facilitate connection/disconnection of the field cables. The new RTDs will have the same accuracy and time response characteristics as the existing RTDs, therefore, there will be no impact on the accident or safety analyses for this change.

The current NSSS Design Transients, Plant Operability and Margin to Trip, and Non-LOCA Safety Analyses remain valid or bounding for the deletion of the control rod withdrawal function and for the replacement of the existing RCS narrow range RTDs.

50.59 Evaluation No: 2010-0003

Title of Change: Remove Requirement for the Use of Standby Spent Fuel Pool (SFP) Heat Exchanger EAC12

Implementation document: ECP-2008-0100

UFSAR affected Sections: Sections 3.5.1 and 9.1.3, Tables 9.1-3, 9.1-4, and 9.1-6

System: Spent Fuel Pool Cooling

Description of Change:

Change Request Package (CRP) TRM/074 redefines the Spent Fuel Pool (SFP) cooling requirements in Technical Requirements Manual (TRM) Sections 3.7.7 and 3.9.4. These sections currently require two (2) SFP cooling loops. These loop definitions include use of the Standby SFP heat exchanger and Standby SFP cooling pump.

The new TRM will require two (2) SFP pumps, and only one (1) of the two (2) heat exchangers (HX's), SFP HX "A" or SFP HX "B", that are permanently installed in the plant. This proposed change maintains redundancy in the cooling loops by eliminating the current dependency on the use of the Standby SFP HX (which is considered a passive component) by recognizing the existing pump crosstie capabilities. This TRM change also eliminates the current requirement to have more than one (1) SFP HX available, by meeting the requirements for backup redundancy by use of the pump crosstie capabilities.

Evaluation Summary:

CRP TRM/074 redefines the SFP loops within the TRM Section 3.7.7 and 3.9.4. This proposed change maintains redundancy in the cooling loops by eliminating the current dependency on the use of the Standby SFP HX (which is considered a passive component) by recognizing the existing pump crosstie capabilities. The proposed SFP loop definitions were evaluated and determined to be acceptable within this evaluation due to the following:

(1) Consideration of a single passive failure for SFP cooling is not required by the NRC Standard Review Plan and is not a part of the licensing basis for the Ginna Station SFP cooling system. Hence, a malfunction of a HX does not need to be considered.

(2) A single active failure can be accommodated with the proposed TRM Change. Specifically, the failure of a SW inlet MOV would cause a loss of SFP cooling. Manual operation would be required to restore SW flow to the available HX. However, sufficient time is available to perform these procedurally directed actions to ensure the structural temperature limit of the pool is not exceeded.

(3) Crosstie capabilities between the SFP Pump "A", SFP Pump "B" and the Standby Pumps provide redundancy in the SFP system.