



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

April 2, 2012

Mr. Joseph E. Pacher
Vice President R.E. Ginna Nuclear Power Plant
R.E. Ginna Nuclear Power Plant, LLC
1503 Lake Road
Ontario, NY 14519

SUBJECT: CLOSEOUT OF BULLETIN 2011-01, "MITIGATING STRATEGIES" -
R.E. GINNA NUCLEAR POWER PLANT (TAC NO. ME6435)

Dear Mr. Pacher:

On May 11, 2011, the U.S. Nuclear Regulatory Commission (NRC) issued Bulletin 2011-01, "Mitigating Strategies" (Agencywide Documents Access and Management System (ADAMS) Accession No. ML111250360), to all holders of operating licenses for nuclear power reactors, except those that have permanently ceased operation and have certified that fuel has been removed from the reactor vessel. The purpose of the bulletin was to obtain a comprehensive verification that licensees' mitigating strategies to maintain or restore core cooling, spent fuel cooling, and containment following a large explosion or fire were compliant with Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.54(hh)(2).

The bulletin required two sets of responses pursuant to the provisions of 10 CFR 50.54(f). R.E. Ginna Nuclear Power Plant, LLC provided its responses to the bulletin by letters dated June 10 and July 8, 2011 (ADAMS Nos. ML11166A037 and ML11195A010).

The Nuclear Regulatory Commission staff has reviewed the information submitted by R.E. Ginna Nuclear Power Plant, LLC and concludes that its response to the bulletin is acceptable. Our safety evaluation is enclosed.

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

Sincerely,

A handwritten signature in black ink that reads "Douglas V. Pickett".

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:
Safety Evaluation

cc w/encl: Distribution via Listserv



UNITED STATES
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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

NRC BULLETIN 2011-01, "MITIGATING STRATEGIES"

R.E. GINNA NUCLEAR POWER PLANT, LLC

R.E. GINNA NUCLEAR POWER PLANT

DOCKET NO. 50-244

1.0 INTRODUCTION

On May 11, 2011, the U.S. Nuclear Regulatory Commission (NRC) issued Bulletin 2011-01, "Mitigating Strategies," (Agencywide Documents Access and Management System (ADAMS) Accession No. ML111250360) to all holders of operating licenses for nuclear power reactors, except those that have permanently ceased operation and have certified that fuel has been removed from the reactor vessel. The bulletin required two sets of responses pursuant to the provisions of with Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.54(f). The first responses were due 30 days after issuance of the bulletin. By letter dated June 10, 2011 (ADAMS Accession No. ML11166A037), R.E. Ginna Nuclear Power Plant, LLC (Ginna) provided its response to this first set of questions (first response). The second responses were due 60 days after issuance of the bulletin. By letter dated July 8, 2011 (ADAMS Accession No. ML11195A010), Ginna provided its response to this second set of questions (second response). As summarized below, the NRC staff has verified that Ginna provided the information requested in the bulletin.

2.0 BACKGROUND

On February 25, 2002, the NRC issued EA-02-026, "Order for Interim Safeguards and Security Compensatory Measures" (ICM Order). Section B.5.b of the ICM Order required licensees to develop specific guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities using readily available resources (equipment and personnel) that can be effectively implemented under the circumstances associated with the loss of large areas of the plant due to explosions or fire.

By letter dated July 26, 2007 (ADAMS Accession No. ML072040409), the NRC staff issued its safety evaluation (SE) to document the final disposition of information submitted by Ginna regarding Section B.5.b of the ICM Order. Along with the SE, the staff issued a conforming license condition to incorporate the B.5.b mitigating strategies into the licensing basis.

On March 27, 2009, the NRC issued 10 CFR 50.54(hh)(2) as a new rule, in order to capture the B.5.b mitigating strategies and related license conditions as regulatory requirements for both

Enclosure

current and future licensees. At that time, licensee compliance with the conforming license conditions was sufficient to demonstrate compliance with 10 CFR 50.54(hh)(2) (74 FR 13926) so no further actions were required on the part of current licensees.

3.0 TECHNICAL EVALUATION

3.1 30-Day Request

In order to confirm continued compliance with 10 CFR 50.54(hh)(2), the bulletin requested that licensees address the following two questions within 30 days of issuing the bulletin:

1. Is the equipment necessary to execute the mitigating strategies, as described in your submittals to the NRC, available and capable of performing its intended function?
2. Are the guidance and strategies implemented capable of being executed considering the current configuration of your facility and current staffing and skill levels of the staff?

The NRC staff reviewed Ginna's first response to determine if it had adequately addressed these questions.

3.1.1 Question 1: Availability and Capability of Equipment

In its first response, Ginna confirmed that equipment it needs to execute the 10 CFR 50.54(hh)(2) mitigating strategies is available and capable of performing its intended function. The NRC staff verified that this confirmation covered equipment needed for each of the three phases of B.5.b mitigation strategies. Therefore, the NRC staff finds that Ginna has adequately responded to Question 1.

3.1.2 Question 2: Guidance and Strategies Can Be Executed

In its first response, Ginna confirmed that the guidance and strategies it has implemented for 10 CFR 50.54(hh)(2) are capable of being executed considering the current facility configuration, staffing levels, and staffing skills. Since Ginna has considered its current facility configuration, staffing levels, and staffing skills, and confirmed that it can execute its implemented guidance and strategies, the NRC staff finds that Ginna has adequately responded to Question 2.

3.2 60-Day Request

The bulletin required a response to the following five questions within 60 days of issuing the bulletin:

1. Describe in detail the maintenance of equipment procured to support the strategies and guidance required by 10 CFR 50.54(hh)(2) in order to ensure that it is functional when needed.
2. Describe in detail the testing of equipment procured to support the strategies and guidance required by 10 CFR 50.54(hh)(2) in order to ensure that it will function when needed.
3. Describe in detail the controls for ensuring that the equipment is available when needed.

4. Describe in detail how configuration and guidance management is ensured so that strategies remain feasible.
5. Describe in detail how you ensure availability of offsite support.

The NRC staff reviewed Ginna's second response to determine if it had adequately addressed these questions. The NRC staff also reviewed the July 26, 2007, SE to determine what equipment, training, and offsite resources at Ginna were relied upon by NRC staff to conclude that Ginna's actions would ensure compliance with Section B.5.b of the ICM Order and the conforming license condition.

3.2.1 Questions 1 and 2: Maintenance and Testing of Equipment

Questions 1 and 2 of the 60-day request required licensees to describe in detail the maintenance and testing of equipment procured to support the strategies and guidance required by 10 CFR 50.54(hh)(2) in order to ensure that it is functional when needed. In its second response, Ginna listed the equipment used to support the 10 CFR 50.54(hh)(2) mitigating strategies which receives maintenance or testing. For each item, Ginna described the maintenance and testing performed, including the frequency and basis for the maintenance or testing activity.

The NRC staff verified that Ginna listed equipment that typically requires maintenance or testing which was relied upon to make conclusions in the SE or commonly needed to implement the mitigating strategies. In its second response, Ginna stated that the fire truck, portable pump, portable power supply, hoses, spray nozzles, and communications equipment receive maintenance or testing. The NRC staff noted that the fuel level for the portable pump is verified during maintenance. Ginna also identified other items that support the mitigating strategies that receive maintenance or testing.

The NRC staff verified that Ginna described the process used for corrective actions and listed the testing performed to ensure that the strategies were initially feasible. Ginna stated in its second response that its 10 CFR Part 50, Appendix B, corrective action program is used to document equipment failure, establish priorities, and perform trending.

Based upon the information above, the NRC staff finds that Ginna has provided the information requested by Questions 1 and 2.

3.2.2 Question 3: Controls on Equipment

Question 3 of the 60-day request required licensees to describe in detail the controls on equipment, such as inventory requirements, to ensure that the equipment is available when needed. A list of inventory deficiencies and associated corrective actions to prevent loss was also requested.

The NRC staff verified that Ginna described its process for ensuring that B.5.b equipment will be available when needed. In its second response, Ginna identified equipment included in its inventory, the inventory frequency, storage requirements, and items verified. Items verified include proper quantity, location, and accessibility of equipment; compressed gas bottle pressures; calibrations; equipment shelf lives, and controls on storage locations. Ginna states

that at the time of its second response there were no outstanding inventory deficiencies that would render the strategies not viable.

The NRC staff verified that Ginna inventoried equipment which was relied upon to make conclusions in the SE or commonly needed to implement the mitigating strategies. In its second response, Ginna stated that procured non-permanently installed B.5.b equipment is inventoried at least annually in accordance with station procedures. The second response specifically states that the following items are included in the inventory: fire truck; hoses; communications equipment; spray nozzles; couplings and adapters; and firefighter turnout gear. Ginna did not specifically state that the portable pump and portable power supply is included in its inventory, but both of these items receive periodic maintenance or testing at least monthly that would also ensure their availability. Ginna also identified other items that support the mitigating strategies that are inventoried.

Based upon the information above, the NRC staff finds that Ginna has provided the information requested by Question 3.

3.2.3 Question 4: Configuration and Guidance Management

Question 4 of the 60-day request required licensees to describe in detail how configuration and guidance management is assured so that the strategies remain feasible.

The NRC staff verified that Ginna described its measures to evaluate plant configuration changes for their effects on the mitigating strategies and to ensure its procedures are current. In its second response, Ginna stated that plant configuration changes are procedurally evaluated against the licensing basis, which includes the B.5.b mitigating strategies. Ginna states that the design change process requires a review of affected procedures and that procedure changes are validated to ensure that the B.5.b mitigating strategies remain viable.

The NRC staff verified that Ginna described measures it has taken to validate the procedures or guidelines developed to support the mitigating strategies. In its second response, Ginna identified testing in response to Question 2 that demonstrated the ability to execute some strategies. Ginna also states that "initially, mitigating strategies were validated by walkdowns, engineering evaluations and/or table top reviews" and they were similarly revalidated in 2011.

The NRC staff verified that Ginna described the training program implemented in support of the mitigating strategies and how its effectiveness is evaluated. In its second response, Ginna identified the training provided to its operations personnel, emergency response organization, security personnel, fire brigade, and other personnel. Ginna also identified the frequency with which each type of training is provided and the methods for training evaluating.

Based upon the information above, the NRC staff finds that Ginna has provided the information requested by Question 4.

3.2.4 Question 5: Offsite Support

Question 5 of the 60-day request required licensees to describe in detail how offsite support availability is assured.

The NRC staff verified that Ginna listed the offsite organizations it relies upon for emergency response, including a description of agreements and related training. The NRC staff compared the list of offsite organizations that Ginna provided in its second response with the information relied upon to make conclusions in the SE. Ginna stated that it maintains letters of agreement or purchase orders with these offsite organizations, which are reviewed annually. Ginna also described the training and site familiarization it provides to these offsite organizations.

Based upon the information above, the NRC staff finds that Ginna has provided the information requested by Question 5.

4.0 CONCLUSION

As described above, the NRC staff has verified that Ginna has provided the information requested in Bulletin 2011-01. Specifically, Ginna responded to each of the questions in the bulletin as requested. The NRC staff concludes that Ginna has completed all of the requirements of the bulletin and no further information or actions under the bulletin are needed.

Principal Contributor: B. Purnell, NRR

Date: April 2, 2012

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Mr. Joseph E. Pacher
Vice President R.E. Ginna Nuclear Power Plant
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Sincerely,
/RA/
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:
Safety Evaluation
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