## **NRR-PMDAPEm Resource**

From:	Thadani, Mohan	
Sent:	Tuesday, December 09, 2014 10:37 AM	
То:	Cates, Laura:(GenCo-Nuc) <laura.cates@exeloncorp.com></laura.cates@exeloncorp.com>	
	(Laura.Cates@exeloncorp.com); Harding Jr, Thomas:(GenCo-Nuc)	
Cc:	Goel, Vijay	
Subject:	Ginna Nuclear Power Plant-Request for Additional Information Regarding NFPA-805	
-	Amendment Request.(TAC NO. MF1393)	

Laura and Tom:

Attached below is the NRC staff's request for additional information related to the subject request for an amendment. We request that you provide your response to this request within 30 days from the date of this email. Timely response is needed to facilitate the completion of the NRC staff's review of the subject request for amendment in a timely manner.

Thank you for your support.

Best regards,

## Mohan & Thadani

Senior Project Manager Millstone, Ginna, and Exelon Northeast Fleet. Plant Licensing Branch I-1 Division of Operating Reactor Licensing Office of Nuclear Reactor Regulation (301) 415-1476 <u>Mohan.Thadani@nrc.gov</u>

## <u>GINNA LICENSE AMENDMENT REQUEST REGARDING ADOPTION OF</u> <u>NFPA 805 – REQUEST FOR ADDITIONAL INFORMATION REGARDING REVISION</u> <u>TO SURVEILLANCE REQUIREMENT 3.8.1.8 (TAC NO. MF1393)</u>

By letter dated March 28, 2013 (Agencywide Document Access Management System (ADAMS) Accession Number ML13093A064), R.E. Ginna Nuclear Power Plant, LLC (the licensee) requested an amendment to the Ginna Renewed Facility Operating License DPR-18. The proposed amendment would adopt a new risk-informed performance-based (RI-PB) fire protection licensing basis, primarily based on the National Fire Protection Association Standard 805. As part of the license amendment request, the licensee proposed to revise Technical Specifications (TS) Surveillance Requirement (SR) 3.8.1.8 regarding testing of the diesel generator automatic trips bypass.

In order to complete its review of the proposed revision of TS SR 3.8.1.8, the U.S. Nuclear Regulatory Commission staff needs the following additional information:

- 1. Please explain the role of emergency diesel generators (EDGs) to meet the fire protection requirements.
- 2. In Attachment S, Page S-4 of the license amendment request (LAR), the licensee states: "[Currently], [w]hen a real or spurious SI [Safety Injection] occurs, the DG overcurrent protection is disabled. If loads fail to trip, then the DG could be damaged when loading a heavily loaded bus. A fire can cause the condition and damage the DG prior to operations being able to secure the DG." The licensee proposed a modification ESR-12-0141 to provide the overcurrent protection for both the EDGs in case of fire outside DG rooms.

Please explain how a fire outside an EDG room can result in spurious SI, a failure of the loads trip, and an overload of the EDG that could damage the EDG when the overcurrent trip is bypassed.

3. In Attachment S, Page S-4 of the LAR, the following is also stated for Item 6 in Table S-2, Plant Modifications Committed: "This modification will correct a variance and result in a reduction in CDF [Core Damage Frequency] to support meeting RG 1.174 criteria."

Please describe how the modification will correct the variance from deterministic requirement, and result in reduction in CDF.

4. On Attachment N, Page N-3 of the LAR, the following is stated: "An overcurrent trip is actuated when current exceeds the relay setpoint and voltage drops below 80% of nominal."

Please provide a copy of the overcurrent and voltage analysis relating to the above statement.

5. On Attachment N, Page N-3 of the LAR, the following is stated: "To implement this change, redundant and independent overcurrent relays will be added to provide coincident trip logic such that both channels must meet trip criteria to trip the diesel generator."

Please provide an electrical protection diagram of the EDG showing various protective relays, the proposed addition of redundant and independent overcurrent relays, and the coincident trip logic.

Hearing Identifier:NRR\_PMDAEmail Number:1749

Mail Envelope Properties (Mohan.Thadani@nrc.gov20141209103600)

Subject:Ginna Nuclear Power Plant-Request for Additional Information RegardingNFPA-805 AmendmentRequest.(TAC NO. MF1393)Sent Date:12/9/2014 10:36:37 AMReceived Date:12/9/2014 10:36:00 AMFrom:Thadani, Mohan

Created By: Mohan.Thadani@nrc.gov

**Recipients:** 

"Goel, Vijay" <Vijay.Goel@nrc.gov> Tracking Status: None "Cates, Laura:(GenCo-Nuc) <Laura.Cates@exeloncorp.com> (Laura.Cates@exeloncorp.com)" <Laura.Cates@exeloncorp.com> Tracking Status: None "Harding Jr, Thomas:(GenCo-Nuc)" <thomas.hardingjr@exeloncorp.com> Tracking Status: None

## Post Office:

Files	<b>Size</b>	Date & Time
MESSAGE	3953	12/9/2014 10:36:00 AM
Options Priority: Return Notification: Reply Requested: Sensitivity: Expiration Date: Recipients Received:	Standard No No Normal	