



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

March 17, 2016

Mr. Bryan C. Hanson
President and Chief Nuclear Officer
Exelon Nuclear
R. E. Ginna Nuclear Power Plant
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: R.E. GINNA NUCLEAR POWER PLANT - REQUEST FOR ADDITIONAL
INFORMATION REGARDING: DELETION OF E BAR DEFINITION AND
REVISION TO REACTOR COOLANT SYSTEM SPECIFIC ACTIVITY
TECHNICAL SPECIFICATIONS (CAC NO. MF7339)

Dear Mr. Hanson:

On February 4, 2016, Exelon Generation Company, LLC submitted an application (Agencywide Documents Access and Management System Accession No. ML16035A015) proposing an amendment for R. E. Ginna Nuclear Power Plant, to replace the current Technical Specifications limit for Reactor Coolant System (RCS) gross specific activity with a new limit for RCS noble gas specific activity.

The Nuclear Regulatory Commission staff is reviewing the submittal and has determined that additional information is needed to complete its review. The specific questions are found in the enclosed request for additional information (RAI). On March 14, 2016, Exelon staff indicated that a response to the RAI would be provided within 30 days of the date of this letter.

Please contact me at (301) 415-3629 if you have any questions on this issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Diane Render".

Diane Render, Project Manager
Plant Licensing Branch I-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-244

Enclosures:
As stated

cc w/encl: Distribution via Listserv

REQUEST FOR ADDITIONAL INFORMATION
REGARDING DELETION OF E BAR DEFINITION AND REVISION TO REACTOR COOLANT
SYSTEM SPECIFIC ACTIVITY TECHNICAL SPECIFICATIONS

R. E. GINNA NUCLEAR POWER PLANT, LLC

EXELON GENERATION COMPANY, LLC

DOCKET NOS. 50-244

R. E. GINNA NUCLEAR POWER PLANT

In an application dated February 4, 2016 (Agencywide Documents Access and Management System Accession No. ML16035A015), Exelon Generation Company, LLC, (Exelon, the licensee), submitted a proposed amendment to the Technical Specifications (TSs) for R. E. Ginna Nuclear Power Plant (Ginna), which would replace the current TSs limit for Reactor Coolant System (RCS) gross specific activity with a new limit for RCS noble gas specific activity. The Nuclear Regulatory Commission staff is reviewing the submittal and has the following question.

The proposed change deletes Condition C of TS 3.4.16 requiring gross specific activity of the coolant less than or equal to $100/\bar{E}$ $\mu\text{Ci/gm}$ and proposes to replace it with Dose Equivalent Xenon-133 (DEX) not within limits. In the current TS 3.4.16, when the gross specific activity of the coolant is greater than $100/\bar{E}$ $\mu\text{Ci/gm}$, the required action is to take immediate action to begin shutdown of the reactor (be in mode 3 with T_{avg} less than 500 °F) within 8 hours [emphasis added]. Ginna proposes 48 hours [emphasis added] to restore DEX within limits. Technical Specification Task Force (TSTF)-490, Revision 0 provided the following justification for this change:

The Completion Time for revised TS 3.4.16 Required Action B.1 will require restoration of Dose Equivalent Xe-133 to within limit in 48 hours. This is consistent with the Completion Time for current Required Action A.2 for Dose Equivalent I-131. The Completion Time of 48 hours for revised Required Action B.1 is acceptable since it is expected that, if there were a noble gas spike, the normal coolant noble gas concentration would be restored within this time period. Also, there is a low probability of an accident occurring during this time period.

For the following reasons the NRC staff needs additional justification for the proposed change:

While it is a correct statement that the proposed change makes the Completion Times of TS 3.4.16 Required Action A.2 and B.1 in NUREG-1431, "Standard Technical Specifications

Enclosure

[STS] Westinghouse Plants," consistent, it is not clear to the NRC staff why the Completion Times should be consistent. The plant Conditions for these Required Actions are different. Ginna's TS 3.4.16 Required Action A.2 is required when the plant is in a condition analyzed in the design basis accident analyses (reactor coolant dose equivalent I-131 is between 1 and 60 $\mu\text{Ci/gm}$). The new proposed TS 3.4.16 Required Action B.1 is required when the plant is in a condition not analyzed [emphasis added] in the design basis accident analyses (DEX is greater than 650 $\mu\text{Ci/gm}$). Typically, the Required Action for a condition not analyzed requires the plant to take immediate actions to begin shutdown of the plant. The proposed change does not take immediate actions to begin shutdown of the plant, but allows 48 hours before the plant is required to begin shutting down.

Therefore, please provide additional justification for the proposed change to increase the Completion Time of TS 3.4.16 Required Action B.1 to 48 hours and why it is acceptable to be in an unanalyzed condition for 48 hours.

March 17, 2016

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/RA/

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