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Attachments: [Proposed Alternative to 250 gpm SFP spray flow.docx](#)

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R. E. Ginna Nuclear Power Plant (Ginna) proposes an alternative approach to NEI 12-06, Revision 0, for providing Spent Fuel Pool (SFP) cooling spray capability and provides the basis for the alternative approach:

Proposed Alternative:

NEI 12-06 Baseline Capability for SFP Cooling includes spray capability via portable monitor nozzles from the refueling floor to the SFP using a portable pump providing a minimum of 200 gpm per unit to the pool, or 250 gpm per unit if overspray occurs, consistent with 10 CFR 50.54(hh)(2). This capability is not required for sites that have SFPs that cannot be drained. Rather than providing calculations to demonstrate 250 gpm of spray to the SFP, Ginna proposes to remove the spray strategy as an alternative to NEI 12-06, Revision 0.

Basis for the alternative approach:

In light of the analysis performed for NUREG-2161, *Consequence Study of a Beyond-Design-Basis Earthquake Affecting the Spent Fuel Pool for a U.S. Mark 1 Boiling Water Reactor*, as well as an industry study being performed under EPRI 3002007148, *Seismic Evaluation Guidance Spent Fuel Pool Integrity Evaluation*, the industry position is that the SFP spray strategy is not warranted. As such, the SFP spray strategy has been removed from proposed NEI 12-06, Revision 2.

By letter dated March 31, 2014, Exelon submitted the Seismic Hazard Reevaluation Report for Ginna to the NRC (ML14099A196). In the NRC staff review of the reevaluated hazard (ML15153A026), the staff concluded that a SFP evaluation was not required since, in accordance with the Electric Power Research Institute (EPRI) report *Seismic Evaluation Guidance: Screening, Prioritization, and Implementation Details (SPID) for the Resolution of Fukushima Near-Term Task Force Recommendation 2.1 Seismic*, criteria, the reevaluated seismic hazard level is bounded by the plant design-basis for frequencies between 1 and 10 Hz. Further, the licensee's reevaluated seismic hazard is acceptable to address other actions associated with NTF Recommendation 2.1, "Seismic". In reaching this determination, the NRC staff confirmed the licensee's conclusion that the licensee's Ground Motion Response Spectrum (GMRS) for the Ginna site is bounded by the Safe Shutdown Earthquake (SSE) for Ginna in the 1 to 10 Hz range, except for a narrow band exceedance between 9 and 10 Hz. As such, a SFP evaluation is not merited.

Since the SFP is designed to withstand the reevaluated seismic hazard, there is no credible external event that could cause the SFP to drain, so as to require SFP spray. Ginna requests NRC Staff review and approval of removing SFP cooling spray capability as an acceptable alternative to the NEI 12-06, Revision 0, guidance.