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10 CFR 50.90

November 30, 2016

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

R.E. Ginna Nuclear Power Plant
Renewed Facility Operating License No. DPR-18
NRC Docket No. 50-244

Subject: Response to Request for Additional Information for the Review of TSTF-490, "Deletion of E Bar Definition and Revision to RCS Specific Activity Tech Spec"

References:

1. Letter from James Barstow (Exelon) to U.S. Nuclear Regulatory Commission, "Application to Revise Technical Specifications to Adopt TSTF-490, 'Deletion of E Bar Definition and Revision to RCS Specific Activity Tech Spec'," dated February 4, 2016 (ML16035A015)

2. Letter from Diane Render (U.S. Nuclear Regulatory Commission) to Bryan Hanson (Exelon), "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)," dated March 17, 2016 (ML16075A119)

3. Letter from James Barstow (Exelon) to U.S. Nuclear Regulatory Commission, "Response to Request for Additional Information for the Review of TSTF-490, Deletion of E-Bar Definition and Revision to RCS Specific Activity Tech Spec," dated April 14, 2016 (ML16105A243)

4. Letter from James Barstow (Exelon) to U.S. Nuclear Regulatory Commission, "Supplement to Response to Request for Additional Information for the Review of TSTF-490, Deletion of E-Bar Definition and Revision to RCS Specific Activity Tech Spec," dated June 28, 2016 (ML16180A448)

5. Letter from Brenda Mozafari (U.S. Nuclear Regulatory Commission) to Bryan Hanson (Exelon), "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)," dated November 7, 2016 (ML16278A077)

By letter dated February 4, 2016 (Reference 1), Exelon Generation Company, LLC (Exelon) submitted a License Amendment Request to implement TSTF-490, "Deletion of E Bar Definition and Revision to RCS Specific Activity Tech Spec," at R.E. Ginna Nuclear Power Plant (Ginna). In the Reference 3 and 4 letters, Exelon provided responses to requests for information. In the Reference 5 letter, the U.S. Nuclear Regulatory Commission (NRC) Staff requested additional information. Attached is our response.

There are no regulatory commitments in this letter.

Exelon has reviewed the information supporting a finding of no significant hazards consideration, and the environmental consideration, that were previously provided to the NRC in Attachment 1 of the Reference 1 letter. The supplemental information provided in this response does not affect the bases for concluding that the proposed license amendment does not involve a significant hazards consideration under the standards set forth in 10 CFR 50.92. In addition, Exelon has concluded that the information provided in this supplemental response does not affect the bases for concluding that neither an environmental impact statement nor an environmental assessment needs to be prepared in connection with the proposed amendment.

If you have any questions or require additional information, please contact T. Loomis at 610-765-5510.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 30th day of November 2016.

Respectfully,

James Barstow
Director - Licensing and Regulatory Affairs
Exelon Generation Company, LLC

Attachment: Response to Request for Additional Information for the Review of TSTF-490, "Deletion of E Bar Definition and Revision to RCS Specific Activity Tech Spec"

cc: Regional Administrator - NRC Region I
NRC Senior Resident Inspector - Ginna
NRC Project Manager, NRR - Ginna
A. L. Peterson, NYSERDA

Attachment

Response to Request for Additional Information for the Review of TSTF-490, "Deletion of E Bar Definition and Revision to RCS Specific Activity Tech Spec"

ARCB-RAI:

The NRC staff is requesting that the licensee please provide a sensitivity analysis similar to that provided for the steam generator tube rupture and main steam line break accidents in letter dated June 28, 2016, that discusses the radiological consequences of the failure of small lines carrying primary coolant outside containment for the proposed change to increase the TS Completion Time of Required Action B.1 from 8 hours to 48 hours; or explain why the discussion provided in UFSAR sections 9.3.4.4.6.1 and 15.6.2 do not apply to this license amendment request.

Response:

A review of the Updated Final Safety Analysis Report (UFSAR) change package that incorporated the references to Systematic Evaluation Program (SEP) Topic 16 ("Radiological Consequences of Small Lines Carrying Primary Coolant Outside Containment") in UFSAR Sections 9.3.4.4.6.1 and 15.6.2 was performed and it was determined that the changes were a rewrite of the September 24, 1981 NRC Safety Evaluation Report of this topic. Although the UFSAR wording can be misconstrued to imply that Rochester Gas & Electric (RG&E) (previous owner of R. E. Ginna Nuclear Power Plant) performed an analysis, a review of the UFSAR wording and the determination that no design basis records exist on this subject confirms that the verbiage is based on the wording of the NRC Safety Evaluation Report. The UFSAR update following the SEP Safety Evaluation Report issuance (NUREG-0821) was performed by a contractor that included the SEP topic wording for information. A review of records has shown that the analysis of this subject was performed by the NRC and not RG&E.

SEP Topic 16 was included in the SEP Safety Evaluation Report, NUREG-0821, "Integrated Plant Safety Assessment Systematic Evaluation Program," for R.E. Ginna Nuclear Power Plant, dated May 1982. Within the Safety Evaluation Report for NUREG-0821, this topic was determined to be acceptable without backfitting, modifications, or commitment by the licensee. The "Safety Evaluation Report related to the full-term operating license for R.E. Ginna Nuclear Power Plant," dated October 1983, was based on the NRC's SEP topic evaluations in NUREG-0821 and also did not result in backfitting, modifications, or commitment by the licensee.

In summary, although a discussion of this topic was included in the UFSAR for informational purposes, the licensee did not document a commitment to this analysis nor was this analysis a part of backfitting, NRC regulations, orders, license conditions, exemptions, and technical specifications. This analysis is not considered part of the licensing basis of the plant and does not apply to this license amendment request; therefore, inclusion of this analysis as part of this amendment request would not be consistent with the current licensing basis.