

June 10, 2021

GL 83-11 Supplement 1

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

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

Subject: Notification of Intent to Perform Analysis Using Vendor Methodology in Accordance with Generic Letter 83-11, Supplement 1

Reference: Generic Letter 83-11, Supplement 1, "Licensee Qualification for Performing Safety Analysis," dated June 24, 1999

As requested in Generic Letter (GL) 83-11, Supplement 1, "Licensee Qualification for Performing Safety Analyses," Exelon Generation Company, LLC (EGC) is notifying the NRC of our intent to perform safety analyses using computer codes and methodology supplied by Westinghouse Electric Company (WEC) which have been previously approved by the NRC. Specifically, the EGC Nuclear Fuels group will perform reload physics analyses for Ginna Station that were previously performed by Westinghouse Electric Company, LLC. EGC has implemented the program outlined in GL 83-11, Supplement 1, as discussed in Attachment 1.

As noted in Section 2.0, "Guidelines," of the GL, "...the licensee should send the NRC a notification of its having followed the guidelines at least 3 months before the date of its intended first licensing application." The first application of the Westinghouse methods will occur in support of the startup of Ginna Station, Unit 1 Cycle 43, currently schedule to begin in October 2021.

If you have any question or require additional information, please contact Jessie Hodge at (610) 765-5532.

Respectfully,



David T. Gudger
Senior Manager - Licensing
Exelon Generation Company, LLC

Attachment 1: Ginna Station, Summary of Program Controlling Use of Vendor Methodology

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

Attachment 1

Ginna Station Summary of Program Controlling Use of Vendor Methodology

Attachment 1
GINNA Station Summary of Program Controlling Use of Vendor Methodology

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Eligibility

The NRC has approved the Westinghouse Methodology detailed in WCAP 9272-P-A (Reference 1). Exelon Generation Company, LLC (EGC) intends to use the Westinghouse Electric Company (WEC) Methodology to perform core reload physics design work.

Application Procedures

Procedures were developed on a task-specific basis utilizing WEC training as well as the WEC Methodology Manual (Reference 2). All applicable procedures were reviewed, approved, and implemented. The WEC Methodology Manual will be consulted during the performance of each analysis task.

Training and Qualification of Licensee Personnel

A training program has been implemented and EGC personnel have been qualified to perform the reload physics analyses for a core reload. Certification guides have been generated to align with task-specific procedures. The qualification of personnel is obtained on a task-specific basis through completion of the certification guide requirements.

Comparison Calculations

Calculated results utilizing the WEC Methodology (References 1 and 2) were compared to the actual startup physics test results, measured flux detector data and plant boron data. The scope of these comparisons encompassed only the parameters that EGC will be authoring upon completion of this notification.

The results of these comparison calculations have met the application acceptance criteria and have been documented in a benchmark report (Reference 3).

Quality Assurance and Change Control

WEC provides quality assurance, change control documents and updates for their Reload Methodology. An Issues Report is issued monthly by WEC and placed on a shared web portal for use by the Utility. The EGC core designer reviews the Issues Report and changes to the WEC Methodology Manual (Reference 2) when completing documentation of the reload products. Calculations and analyses performed by EGC using the WEC Methodology will be performed in accordance with EGC Quality Assurance Program.

The EGC Software Quality Assurance Program required that any identified errors that affect the use or operation of software products be documented in the EGC corrective action program. Any issues found that involve vendor software will be immediately communicated to the vendor.

References

1. WCAP-9272-P-A, "Westinghouse Reload Safety Evaluation Methodology," July 1985
2. Westinghouse METCOM (Current Release)
3. NF173310, "Core Design Benchmark to Support Generic Letter 83-11 Supplement 1 Requirements," September 29, 2017