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

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

Subject: Annual Commitment Change Notification

As required by NEI 99-04, "Guidelines for Managing NRC Commitments," as endorsed by SECY-00-0045, Acceptance of NEI 99-04, "Guidelines for Managing NRC Commitments," Ginna submits this notification of commitment changes.

No approval or action is expected. If you have any questions, please contact Mr. Chris Bradshaw at (315) 791-3246.

There are no new regulatory commitments contained in this letter.

Respectfully,

A handwritten signature in black ink, appearing to read "Paul Swift", with a long horizontal flourish extending to the left.

Paul Swift

Attachment 1: Report of Commitment Changes

cc: NRC Regional Administrator, Region 1
NRC Project Manager, Ginna
NRC Resident Inspector, Ginna (e-mail)

Attachment 1

Report of Commitment Changes from November 2020 through December
2021 Performed in Accordance with NEI 99-04

Report of Commitment Changes from November 2020 through December 2021 Performed IAW NEI 99-04

Commitment Change Evaluation No.: 2021-0002, Reduce overall impact on strainer head loss and in-vessel effects [01704323]

Source Document: ML13141A272, Resolution Path and Schedule for Generic Safety Issue (GSI)-191 Closure, dated 05/15/2013 [WPLNRC-1002705]

Original Commitment: COMMITMENT: Reduce the overall impact on strainer head loss and in-vessel effects
o Identify insulation and aluminum that can be removed from containment.
o Revise 3-D CAD model, debris generation, transport, and chemical effects analyses, for revised insulation and aluminum loading.
o Perform Strainer Bypass Testing.
COMPLETION DATE: September 30, 2014

Revised Commitment: Commitment cancelled.

Justification Summary:

On 07/23/2019, the NRC closed Generic Issue GSI-191 [ML19203A303)].

WPLNRC-1003489, R.E. Ginna Nuclear Power Plant, Final Response and Close-Out to Generic Letter 2004-02, was sent to the NRC on 04/28/2021 [ML21118A007]. This commitment composed of three (3) elements is cancelled as described in Attachment 1, Page 1 of 3, item No. 1.

The NRC sent Ginna WPLNRC-1003538, Closeout of Generic Letter 2004-02, "Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized-Water Reactors" (EPID-L-2017-LRC-0000), dated 10/8/2021 [ML21214A178] stating, "Based on its review, the NRC staff finds the licensee's responses to GL 2004-02 are adequate and considers GL 2004-02 closed for Ginna."

Report of Commitment Changes from November 2020 through December 2021 Performed IAW NEI 99-04

Commitment Change Evaluation No.: 2021-0003, If needed, discuss alternate resolution path consistent with risk-informed methods [01704326]

Source Document: ML13141A272, Resolution Path and Schedule for Generic Safety Issue (GSI)-191 Closure, dated 05/15/2013 [WPLNRC-1002705]

Original Commitment: COMMITMENT: If Ginna determines that the proposed testing and analysis resolution path alone will not lead to acceptable results, then an alternate resolution path will be discussed with the NRC to gain acceptance of the proposed path and to establish an acceptable completion schedule. This resolution path may be consistent with risk-informed methods developed for Option 3.
COMPLETION DATE: 60 days following PWROG testing results or completion of thermal hydraulic analysis of vessel internals, whichever is later.

Revised Commitment: Commitment cancelled.

Justification Summary:

On 07/23/2019, the NRC closed Generic Issue GSI-191 [ML19203A303].

WPLNRC-1003489, R.E. Ginna Nuclear Power Plant, Final Response and Close-Out to Generic Letter 2004-02, was sent to the NRC on 04/28/2021 [ML21118A007]. This commitment composed of three (3) elements is cancelled as described in Attachment 1, Page 2 of 3, item No. 4.

The NRC sent Ginna WPLNRC-1003538, Closeout of Generic Letter 2004-02, "Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized-Water Reactors" (EPID-L-2017-LRC-0000), dated 10/8/2021 [ML21214A178] stating, "Based on its review, the NRC staff finds the licensee's responses to GL 2004-02 are adequate and considers GL 2004-02 closed for Ginna."

Report of Commitment Changes from November 2020 through December 2021 Performed IAW NEI 99-04

Commitment Change Evaluation No.: 2021-0004, CRFC demister filter Inspection frequency change from 6 to 9 months [04402994-01]

Source Document: In WPLNRC-RG014022, Notice of Violation (NRC Inspection Report No. 50-244/93-06), dated 05/14/1993, RG&E was given a violation for a fire in containment in the CRFC roughing filters/demisters. In WPLNRC-RG014071, Reply to a Notice of Violation, dated 07/14/1993, RG&E accepted the violation and made a commitment to the NRC to inspect CRFC filters.

Original Commitment: In WPLNRC-RG014071, Reply to a Notice of Violation, dated 07/14/1993, RG&E accepted the violation and committed to the NRC to inspect CRFC filters monthly. *“Existing plant procedures will be enhanced to provide inspection criteria for visual inspection of the demisters for combustibility. Visual inspections will be conducted and documented on a monthly basis, in accordance with these enhanced plant procedures. These procedures will contain inspection criteria which will consider the recommendations from the manufacturer of the demisters and from a consultant experienced in nuclear safety-related ventilation system testing. These criteria will also incorporate the applicable portions of ANSI-N510, 1989 edition (for consistency with industry standards). When the established criteria are not satisfied, corrective actions will be taken in accordance with the Maintenance Work Control System.”* This commitment was later revised to quarterly (4.54-2005-001) and then to semi-annually (4.54-2011-002).

Revised Commitment: In 04402994-01 (02/17/2021), the CRFC demister filter Inspection frequency was revised from 6 to 9 months.

Justification Summary:

[Commitment Change Tracking #2020-0001] The frequency was optimized based on negative inspection results to date and to save dose as documented in the Engineering evaluation in 02665227-04 stating that one mid-cycle inspection and the refueling outage inspection were sufficient to monitor the condition of the filters. The inspection criterion to ensure the filters are free of combustible material was unchanged.

NOTE: During the review to extend the frequency from 6 to 9 months, it was discovered that the scheduling mechanism for the procedure containing the online inspections had been cancelled (PMs P203552 and P201703 under PMMR PMC-18-107793). This is documented in Issue Report 04425003, Missed Regulatory Commitment - CRFC Demister Inspections, and the associated Work Group Evaluation. Several actions were taken including the formal updating of 04402994-01.

Report of Commitment Changes from November 2020 through December 2021 Performed IAW NEI 99-04

Commitment Change Evaluation No.: 2021-0004, CRFC demister filter Inspection frequency change from 9 to 18 months [04402994-03]

Source Document: In WPLNRC-RG014022, Notice of Violation (NRC Inspection Report No. 50-244/93-06), dated 05/14/1993, RG&E was given a violation for a fire in containment in the CRFC roughing filters/demisters. In WPLNRC-RG014071, Reply to a Notice of Violation, dated 07/14/1993, RG&E accepted the violation and made a commitment to the NRC to inspect CRFC filters.

Original Commitment: In WPLNRC-RG014071, Reply to a Notice of Violation, dated 07/14/1993, RG&E accepted the violation and committed to the NRC to inspect CRFC filters monthly. *“Existing plant procedures will be enhanced to provide inspection criteria for visual inspection of the demisters for combustibility. Visual inspections will be conducted and documented on a monthly basis, in accordance with these enhanced plant procedures. These procedures will contain inspection criteria which will consider the recommendations from the manufacturer of the demisters and from a consultant experienced in nuclear safety-related ventilation system testing. These criteria will also incorporate the applicable portions of ANSI-N510, 1989 edition (for consistency with industry standards). When the established criteria are not satisfied, corrective actions will be taken in accordance with the Maintenance Work Control System.”* This commitment was later revised to quarterly (4.54-2005-001), then to semi-annually (4.54-2011-002), and then to every 9 months (04402994-01).

Revised Commitment: In 04402994-03 (09/29/2021), the CRFC demister filter Inspection frequency was revised from 9 to 18 months, eliminating the online inspection but continuing to perform the refueling outage inspection.

Justification Summary:

In ECP-21-000329, ESR-21-0151 - CRFC roughing filter inspection extension, dated 08/04/2021 (Current), Engineering concluded, “The periodic inspection of the CRFC roughing filters/demisters can be extended to 18 months, as there is no reasonable combustion sources to ignite the filters outside of refueling outages, and there is no history of there being any issues with combustible debris or contamination buildup on the filters other than the event in 1993 that initiated the commitment.”

Report of Commitment Changes from November 2020 through December 2021 Performed IAW NEI 99-04

Commitments modified in 2021 with notification to the NRC via separate correspondence:

Subject	Date	Accession No.
Use of Stainless-Steel Filler Rods in Core	09/20/2021	ML21264A014 (not publicly available)
Notification of Deviation from Pressurized Water Reactor Owners Group (PWROG) Report WCAP-17451-P, Revision 1, "Reactor Internals Guide Tube Wear - Westinghouse Domestic Fleet Operational Projections"	11/12/2021	ML21316A051