

May 26, 2022

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: Supplemental Information for R.E. Ginna Nuclear Power Plant to Adopt 10 CFR 50.69, "Risk-Informed categorization and treatment of structures, systems and components for nuclear power reactors."

- References:
1. Letter from D. Gudger (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission, "Application to Adopt 10 CFR 50.69, Risk-Informed categorization and treatment of structures, systems and components for nuclear power reactors," dated May 20, 2021 (ML21141A009)
 2. Letter from D. Gudger (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission, "Supplemental Information No. 1 for R.E. Ginna Nuclear Power Plant to Adopt TSTF-505, 'Provide Risk-Informed Extended Completion Times – RITSTF Initiative 4b', Revision 2 and 10 CFR 50.69, "Risk-Informed categorization and treatment of structures, systems and components for nuclear power reactors." dated October 14, 2021 (ML21287A006)

This letter is a supplement to Reference 1. Exelon Generation Company, LLC (Exelon) proposed an amendment to change the R. E. Ginna Nuclear Power Plant (Ginna) Technical Specification (TS). The proposed amendment would modify the licensing basis in accordance with the application to adopt 10 CFR 50.69, "Risk-Informed categorization and treatment of structures, systems and components for nuclear power reactors," (ADAMS Accession No. ML21141A009). By letter dated October 14, 2021 (Reference 2), Exelon provided supplemental information to the proposed amendment (Reference 1). Attachment 3 of Reference 2 provides a suggested license condition. This letter provides clarification on the proposed license condition and supersedes what was provided in Attachment 3 of Reference 2.

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Constellation Energy Generation, LLC (CEG) has reviewed the information supporting a finding of no significant hazards consideration and the environmental consideration provided to the NRC in Reference 1. The responses provided in this letter do not affect the bases for concluding that the proposed license amendment does not involve a significant hazards consideration. Furthermore, the responses provided in this letter do 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.

There are no commitments contained in this response.

In accordance with 10 CFR 50.91, "Notice for public comment; State consultation," paragraph (b), EGC is notifying the State of New York of this application for license amendment by transmitting a copy of this letter and its attachments to the designated State Official.

Should you have any questions concerning this letter, please contact Jessie Hodge at (610) 765-5532.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 26th day of May 2022.

Respectfully,



David T. Gudger
Senior Manager - Licensing
Constellation Energy Generation, LLC

Attachments: 1. License Condition Information

cc:	USNRC Region I, Regional Administrator	w/ attachments
	USNRC Senior Resident Inspector, Ginna	"
	USNRC Project Manager, Ginna	"
	A. L. Peterson, NYSERDA	"

ATTACHMENT 1

License Amendment Request

R. E. Ginna Nuclear Power Plant

Renewed Facility Operating License No. DPR-18

Docket No. 50-244

License Condition Information

Constellation proposes the addition of the following condition to the renewed operating license of Ginna to document the NRC's approval of the use 10 CFR 50.69.

Constellation Energy Generation, LLC is approved to implement 10 CFR 50.69 using the processes for categorization of Risk-Informed Safety Class (RISC)-1, RISC-2, RISC-3, and RISC-4 Structures, Systems, and Components (SSCs) using: Probabilistic Risk Assessment (PRA) models to evaluate risk associated with internal events, including internal flooding, and internal fire; the shutdown safety assessment process to assess shutdown risk; the Arkansas Nuclear One, Unit 2 (ANO-2) passive categorization method to assess passive component risk for Class 2 and Class 3 and non-Class SSCs and their associated supports; the results of the non-PRA evaluations that are based on the IPEEE Screening Assessment for External Hazards updated using the external hazard screening significance process identified in ASME/ANS PRA Standard RA-Sa-2009 for other external hazards except seismic; and the alternative seismic approach as described in Exelon's submittal letter dated [May 20, 2021], and all its subsequent associated supplements as specified in License Amendment No. [XXX] dated [DATE].

Constellation Energy Generation, LLC will complete the implementation items listed in Attachment 7 of Exelon Letter to the NRC dated May 20, 2021, prior to implementation of 10 CFR 50.69. All issues identified in the attachment will be addressed and any associated changes will be made, focused-scope peer reviews will be performed on changes that are PRA upgrades as defined in the PRA standard (ASME/ANS RA-Sa -2009, as endorsed by RG 1.200, Revision 2), and any findings will be resolved and reflected in the PRA of record prior to the implementation of 10 CFR 50.69.

Prior NRC approval, under 10 CFR 50.90, is required for a change to the categorization process specified above (e.g., change from a seismic margins approach to a seismic probabilistic risk assessment approach).