

June 9, 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 TSTF-505, "Provide Risk-Informed Extended Completion Times – RITSTF Initiative 4b," Revision 2

- References:
1. Letter from D. Gudger (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission, "License Amendment Request to Revise Technical Specifications to Adopt Risk-Informed Completion Times TSTF-505, Revision 2, 'Provide Risk-Informed Extended Completion Times – RITSTF Initiative 4b,' " dated May 20, 2021 (ML21140A324)
  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 TS requirements to permit the use of Risk Informed Completion Times in accordance with TSTF-505, Revision 2, "Provide Risk-Informed Extended Completion Times – RITSTF Initiative 4b," (ADAMS Accession No. ML21140A324). 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.

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.

CEG also requests ADAMS for immediate release marked as a publicly available document.

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 9<sup>th</sup> day of June 2022.

Respectfully,

*David T. Gudger*

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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 of Risk-Informed Completion Times TSTF 505, Revision 2, "Provide Risk Informed Extended Completion Times RITSTF Initiative 4b"

Constellation Energy Generation, LLC is approved to implement TSTF-505, Revision 2, modifying the Technical Specification requirements related to Completion Times (CT) for Required Actions to provide the option to calculate a longer, Risk-Informed CT (RICT). The methodology for using the new Risk-Informed Completion Time Program is described in NEI 06-09-A, "Risk-Informed Technical Specifications Initiative 4b, Risk-Managed Technical Specifications (RMTS) Guidelines," Revision 0, which was approved by the NRC on May 17, 2007.

Constellation Energy Generation, LLC will complete the implementation items listed in Attachment 6 of Exelon Letter to the NRC dated May 20, 2021, prior to implementation of the RICT Program. 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 the RICT Program.