

September 20, 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: Clarification Letter to the Application to Revise Technical Specifications 5.6.5, "Core Operating Limits Report (COLR)"

- References:
1. Letter from David Gudger (CEG) to U.S. NRC, "Application to Revise Technical Specifications 5.6.5, 'Core Operating Limits Report (COLR),' " dated August 22, 2022 (ML22234A169)
  2. Letter from Anthony Schoedel (Westinghouse) to U.S. NRC, "Extension of FULL Spectrum™ LOCA (FSLOCA™) Evaluation Methodology to 2-loop Westinghouse Pressurized Water Reactors (PWRs) with Information to Satisfy Limitations and Condition Specific to 2-loop Plant Types (Proprietary/Non-Proprietary)," dated September 16, 2021 (ML21265A202)

On August 22, 2022, Constellation Energy Generation, LLC (CEG) submitted a License Amendment Request (LAR) (Reference 1). The LAR contained statements that can lead to confusion that Westinghouse Letter LTR-NRC-21-22 (Reference 2) was already under separate review, as opposed to being pulled into the review of the present LAR submittal for Ginna (Reference 1). Per LTR-NRC-21-22 (Reference 2), "*This submittal [LTR-NRC-21-22] is being placed on the docket for information only to support plant-specific submittals that reference the NRC-approved Westinghouse FSLOCA topical report documented in WCAP-16996-P-A, Revision I, Volumes I, II, III. Westinghouse is not requesting generic NRC review and approval of this submittal under the LIC-S00 topical report process.*" There is no concurrent review of these two documents. This letter will clarify the LAR (Reference 1) statements.

The 2<sup>nd</sup> paragraph of the LAR (Reference 1) cover letter and the 1<sup>st</sup> paragraph under Section 1.0 Description in Attachment 1 of the LAR (Reference 1) both have the following statement: "*Use of WCAP-16996-P-A for 2-Loop plants is currently under NRC review with the issuance of Westinghouse Letter LTR-NRC-21-22, 'Extension of FULL SPECTRUM™ LOCA (FSLOCA™) Evaluation Methodology to 2-loop Westinghouse Pressurized Water Reactors (PWRs) with Information to Satisfy Limitations and Conditions Specific to 2-loop Plant Types (Proprietary/Non-Proprietary),' dated September 16, 2021.*"

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These statements should be replaced with the following: "*Westinghouse Letter LTR-NRC-21-22, 'Extension of FULL SPECTRUM TM LOCA (FSLOCATM) Evaluation Methodology to 2-loop Westinghouse Pressurized Water Reactors (PWRs) with Information to Satisfy Limitations and Conditions Specific to 2-loop Plant Types (Proprietary/Non-Proprietary),' dated September 16, 2021, docketed information to support plant-specific submittals that reference the NRC-approved Westinghouse FSLOCA topical report documented in WCAP-16996-P-A, Revision 1, Volumes I, II, III. The amendment request for Ginna relies upon information contained in LTR-NRC-21-22 to justify the extension of the NRC-approved methodology to 2-Loop Westinghouse PWRs equipped with upper plenum injection.*"

There are no commitments contained in this letter.

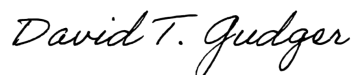
In accordance with 10 CFR 50.91, "Notice for public comment; State consultation," paragraph (a)(1), the analysis about the issue of no significant hazards consideration using the standards in 10 CFR 50.92 is being provided to the Commission.

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

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

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 20<sup>th</sup> day of September 2022.

Respectfully,



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

cc: Regional Administrator, NRC Region I  
NRC Resident Inspector  
NRC Project Manager  
A. L. Peterson (NYSERDA)