

April 11, 2000

Dr. Robert C. Mecredy
Vice President, Nuclear Operations
Rochester Gas and Electric Corporation
89 East Avenue
Rochester, NY 14649

SUBJECT: CLOSURE OF THE STAFF REVIEW OF THE ROCHESTER GAS AND ELECTRIC CORPORATION RESPONSE TO GENERIC LETTER 98-02, "LOSS OF REACTOR COOLANT INVENTORY AND ASSOCIATED POTENTIAL FOR LOSS OF EMERGENCY MITIGATION FUNCTIONS WHILE IN A SHUTDOWN CONDITION," (TAC NO. MA4787)

Dear Dr. Mecredy:

On May 28, 1998, the U.S. Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 98-02 to all holders of operating licenses for pressurized-water reactors (PWR), except those who have permanently ceased operations, and have certified that fuel has been permanently removed from the reactor vessel. The NRC issued GL 98-02 to request that PWR licensees evaluate a September 17, 1994, event, which occurred at Wolf Creek, which had the potential to draindown the reactor coolant system (RCS) to the refueling water storage tank (RWST) and, at the same time, render the emergency core cooling system (ECCS) and residual heat removal (RHR) system inoperable by introducing a steam/water mixture to the suction side of the ECCS and RHR pumps. Addressees of GL 98-02 were requested to provide the following information within 180 days: (1) an assessment of whether the addressee's facility is vulnerable to the September 17, 1994, Wolf Creek event, and (2), if the facility is found to be vulnerable, an assessment of the plant-specific 10 CFR Part 50, Appendix B, quality assurance program attributes which will prevent the subject event. If the addressee's facility was determined to be vulnerable, a response to information item (1) was to be provided pursuant to 10 CFR 50.54(f) and 10 CFR 50.4, and the responses to information items (1) and (2) were to be kept in a licensee's retrievable system for use by the NRC staff on an as-needed basis.

On December 1, 1998, you provided your response to GL 98-02 for the R. E. Ginna Nuclear Power Plant. In this letter, you indicated that six RHR/ECCS flow paths at Ginna had the potential to be susceptible to common-cause failures. You also indicated that you had implemented controls and procedures that make it unlikely that a common-cause failure of the ECCS or RHR system would result in a loss-of-operability event similar to the one that occurred at Wolf Creek on September 17, 1994. You indicated that these procedures and activities include the following controls to preclude such an event:

- Operating Procedures to avoid unusual lineups by providing that a precise sequence of steps be followed for proper system configuration.
- Testing Procedures to avoid unintentional configurations by requiring that specific initial conditions be met for the test to occur.

- Motor Operated Valve Automatic Testing System activities to require proper planning and scheduling by the Ginna Outage Planning Group; both electrical and fluid isolation must occur prior to testing.
- Maintenance activities to require approval by plant Operations and must include appropriate holds for review during the commencement of the activities.
- Station holding, which can result in a change to the system configuration, is under control of licensed personnel in communication with the Ginna Operating Shift Supervisor.
- Specific training targeted to shutdown evaluation, such as RHR operations, is conducted prior to scheduled refueling outages; GL 98-02 is included in operator requalification training.

In addition, you also indicated that you would further evaluate plant procedures and the need for additional training prior to the March 1999 refueling outage in order to determine whether additional enhancements were needed prior to the outage.

On January 23, 2000, the NRC completed an inspection of activities and programs at the R.E. Ginna Nuclear Power Plant. This inspection scope included a review of the activities that were implemented to address the issues identified in GL 98-02. On completion of its review, the staff concluded that you had provided an acceptable response to GL 98-02, and that the corrective procedural, maintenance, and training enhancements implemented at the plant were sufficient to provide assurance that an event similar to the one at Wolf Creek would be precluded at the R.E. Ginna Nuclear Power Plant. The staff provided the specific details of its review in NRC Integrated Inspection Report No. 05000244/1999012, which was issued on February 11, 2000.

The NRC staff has reviewed your response to GL 98-02 and has concluded that (1) all the information requested by GL 98-02 has been provided and (2) that your on-site activities adequately addressed the concerns of GL 98-02 for R.E. Ginna Nuclear Power Plant; therefore, we consider GL 98-02 to be closed for the R.E. Ginna Nuclear Power Plant. This completes our activities regarding TAC No. MA4787.

Sincerely,

/RA/

Guy S. Vissing, Sr. Project Manager, Section 1
Project Directorate I
Division of Licensing and Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-244

cc: See next page

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