

August 26, 2003

LICENSEE: Rochester Gas & Electric (RG&E)

FACILITY: R. E. Ginna Nuclear Power Plant (Ginna)

SUBJECT: SUMMARY OF TELECOMMUNICATION WITH ROCHESTER GAS & ELECTRIC CORPORATION (RG&E) TO DISCUSS THE RESPONSE TO THE LICENSE RENEWAL APPLICATION (LRA) RAIs - R. E. GINNA NUCLEAR POWER PLANT (Ginna)

On July 10, 2003, the NRC staff (the staff) and the representative from RG&E held a telecommunication (telecon) to discuss NRC staff request for additional information (RAI) related to Ginna LRA. The telecon concerned requests for clarification of information contained in the LRA and the responses to previously submitted RAIs. A list of telephone participants are shown in Enclosure 1. The following is a summary of the discussions.

Question 1:

The staff said with respect to Table 3.4-1 line number (1) the table discussion column states that the line number was consistent with NUREG-1801. Yet line number (1) was not associated with any components in Table 2.3.3-3, i.e. spent fuel cooling and storage. The staff wanted the applicant to explain this apparent discrepancy.

Answer 1:

The applicant responded to the staff query as follows.

Due to the non-specific nature of the component types listed for that line number in the Standard Review Plan (SRP) table (components in spent fuel cooling and makeup system) the applicant felt it was imprudent to, carte blanche, link any components to that line number. Instead, they verified that for components that were made of materials susceptible to the aging effects described in the line number, the programs as listed in that line number were applied. After that process was completed they were able to conclude that they were consistent with the Generic Aging Lessons Learned (GALL) Report. The applicant expected that the staff would check the applicant's conclusions on a component-type basis (which the staff did) and would confirm that the applicant's conclusions were based on specific material/environment combinations.

To illustrate why this was problematic the applicant examined a "diaphragm seal" from Table 2.3.3-3. The seal was included in the SRP grouping of "components in spent fuel cooling and makeup" but its material/environment combination did not have the aging effects of "loss of material". Consequently, line number (1) for that component would not be consistent with the GALL.

After the applicant verified all of its system components on a plant-specific level, the applicant didn't feel comfortable linking it to line number (1), although that line number was clearly

appropriate for some, but not all, "components in spent fuel cooling and makeup". The staff agreed with the applicant's conclusions.

Question 2:

With respect to Table 3.4-1, line numbers (16) and (17) - there are no cross reference links associated with the heat exchangers listed in Table 2.3.3-3, "Spent Fuel Cooling and Storage." The staff wanted the applicant to explain this apparent discrepancy. The staff also wanted to know how the applicant would typically perform an inspection if an opportunity arose in digging up buried components.

Answer 2:

The applicant responded to the staff query as follows.

Missing links to Table 3.4-1, line number (16) were identified for other plant-specific systems grouped within auxiliary systems in RAI 3.4.8-1. Line number (16) was an appropriate link for heat exchangers in the Spent Fuel Cooling System, Table 2.3.3-3.

Line number (17) was only applicable to buried components and there are no buried heat exchangers. RAI 3.4.8-2 identified a missing link to line number (17) with respect to components shown on Table 2.3.3-8. The responses to the RAIs answered the staff questions on this item.

With respect to line number (17) the applicant explained how inspections of opportunity were identified and accomplished for buried piping and components as follows (this question can be associated with RAI B2.1.7-1): when the maintenance planning staff at Ginna plans an activity that involves digging, the Civil and License Renewal staff is contacted to evaluate whether the activity will uncover any components that could provide inspection opportunities. The applicant's internal commitments are reviewed as well to ascertain if any license renewal inspection activities are associated with components that will be uncovered.

On the day the staff called (i.e. July 10, 2003), excavations had commenced to modify the fire water system. The applicant confirmed that the planning package for that job included saving a piece of the fire water pipe being removed for external surface evaluations and inspections on the internal surface of the pipe that will remain in the ground. Due to trench hole instability, the planned excavation had to be widened for personnel safety considerations. Performance of the job then led to the originally unplanned activity of uncovering one diesel fuel oil tank. This provided an additional opportunity for inspection. Inspection personnel were able to access the tank exterior surface and make wall thickness measurements. Typically all exposed components are photographed for future reference and comparison. The results of the inspection were positive and no adverse findings were observed in that inspection activity.

Question 3:

The staff wanted the applicant to explain how Table 3.4-1, line numbers (9) and (12) were appropriate to the Ginna plant, since they apply to boraflex sheets only and Ginna did not have any.

Answer 3:

This question is associated with the applicant's response to RAI B2.1.23-9 previously submitted. As the LRA, RAI response, and UFSAR indicate, Ginna does not credit boraflex. Line numbers (9) and (12) have very similar aging effects except line number (9) includes the effect of loss of material. The applicant explained that line number (12) was not linked to the "structural" components representing the fuel racks in Table 2.3.3-3 because it seemed only appropriate to boraflex sheets. The applicant confirmed that it did evaluate for loss of material and neutron absorbing capability in the borated stainless steel material used for the high density spent fuel racks and that covers the aging effects in both line numbers.

Question 4:

The staff stated it does not appear that any Auxiliary Systems components are associated with Table 3.4-1 line number (24). Please explain.

Answer 4:

The applicant responded to the staff query as follows.

This question is associated with RAI B2.1.29, C-RAI B.2.29, RAI 3.4.12-1, and RAI 3.4.2-1. C-RAI B.2.1.29 provides a list of the components susceptible to selective leaching. Due to the way the system components are tracked, the susceptible components are evaluated in different system groups. Thus, the line item could not be directly referenced against the auxiliary system components contained in the LRA Section 2 tables even though in Table 3.4-1 the applicant acknowledged the effect and provided the programs that manage it.

RG&E has reviewed and did not have any comments on this telecon summary.

*/RA/*

Ram Subbaratnam, Project Manager  
License Renewal Section B  
License Renewal and Environmental Impacts Program  
Division of Regulatory Improvement Programs  
Office of Nuclear Reactor Regulation

Docket No.: 50-244

Enclosure: As stated

cc w/encl: See next page

Answer 3:

This question is associated with the applicant's response to RAI B2.1.23-9 previously submitted. As the LRA, RAI response, and UFSAR indicate, Ginna does not credit boraflex. Line numbers (9) and (12) have very similar aging effects except line number (9) includes the effect of loss of material. The applicant explained that line number (12) was not linked to the "structural" components representing the fuel racks in Table 2.3.3-3 because it seemed only appropriate to boraflex sheets. The applicant confirmed that it did evaluate for loss of material and neutron absorbing capability in the borated stainless steel material used for the high density spent fuel racks and that covers the aging effects in both line numbers.

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cc w/encl: See next page

\*See previous concurrence

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