

October 20, 2003

**Robert C. Mecredy**  
Vice President  
Nuclear Operations

Mr. Robert L. Clark  
Office of Nuclear Regulatory Regulation  
U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555-0001

Subject: Submittal of Relief Request VR-4 Related to the Requirements of  
10CFR50.55a(f), "Inservice testing requirements"  
Rochester Gas and Electric Corporation  
R.E. Ginna Nuclear Power Plant  
Docket No. 50-244

- References: (1) Letter from M. Gamberoni, NRC, to R.C. Mecredy, RG&E, Subject:  
*REQUESTS FOR RELIEF FROM THE AMERICAN SOCIETY OF  
MECHANICAL ENGINEERS BOILER AND PRESSURE VESSEL CODE  
(ASME CODE) SECTION XI REQUIREMENTS FOR THE R. E. GINNA  
NUCLEAR POWER PLANT FOURTH 10-YEAR INTERVAL OF THE  
PUMP AND VALVE INSERVICE TESTING PROGRAM (TAC NO.  
MA7265)*, dated June 13, 2000.
- (2) Letter from R.C. Mecredy, RG&E, to G.S. Vissing, NRC, Submittal of  
"Ginna Station Fourth Interval Inservice Testing (IST) Program, along  
with the associated Relief Requests, Cold Shutdown Justifications, and  
Refueling Outage Justifications", dated November 24, 1999.

Dear Mr. Clark:

By letter dated June 13, 2000 (Reference 1), the NRC provided approval of the relief requests associated with the Ginna Station fourth 10-year interval inservice testing (IST) program for pumps and valves (Reference 2). The current Ginna Station IST program has been developed as required by Title 10 Code of Federal Regulations Part 50, Paragraph 50.55a(f), in accordance with the 1989 Edition of the ASME Boiler and Pressure Vessel Code - Section XI - "Rules for Inservice Inspection of Nuclear Power Plant Components". This edition refers directly to the ASME/ANSI OMa-1988 standard for pump testing (Part 6) and for valve testing (Part 10). Additionally, OMa-1988, Part 10 refers to ASME/ANSI OM-1987, Part 1, for pressure relief device testing. Rochester Gas and Electric (RG&E) intends to begin utilizing Appendix I of ASME OM CODE-1998 in lieu of ASME/ANSI OM-1987 Part 1 for pressure relief device testing in advance of December 31, 2003.

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The Appendix I of ASME OM Code-1998 was incorporated by reference in 10 CFR 50.55a with an amendment to that regulation effective October 28, 2002. As such, RG&E may implement Appendix I of ASME OM Code-1998 without NRC approval.

However, updating to a newer approved ASME Code results in the need to revise the currently approved relief request VR-4 in regards to the referenced Code paragraph. The attached revised Relief Request VR-4 requests relief from Paragraph I-7310 of Appendix I of ASME OM CODE-1998, which requires a determination of operation and electrical characteristics of installed position indication after maintenance or set pressure adjustment for Class 1 safety valves. These valves are mechanical spring-actuated valves with an externally-mounted LVDT stem position indicator. The position indicator must be removed in order to permit removal of the safeties each refueling outage for shipment to an off-site vendor for set pressure testing. It would be necessary to intentionally challenge RCS pressure limits to actuate these safety valves in order to perform position indication testing following reinstallation after set pressure testing. As an alternative, RG&E proposes that the valves be simulated to actuate using existing station calibration procedures. The procedure utilizes movement of the valve's LVDT coil (up/down) and verifies position via an alarm in the Control Room.

The purpose of this letter is to request that the NRC grant RG&E continued relief from certain IST program code requirements pursuant to 10 CFR 50.55a(a)(3)(ii). The details and basis for this relief request is provided in the attachment to this letter. RG&E requests relief for the remainder of the Ginna Station IST program fourth 10-year interval.

RG&E requests NRC approval of this relief request by November 30, 2003. If you should have any questions regarding this submittal, please contact Mr. Thomas Harding, 585-771-3384.

Very truly yours,



Robert C. Mecredy

attachments

xc: Mr. Robert Clark (Mail Stop O-8-C2)  
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U.S. NRC Ginna Senior Resident Inspector

ROCHESTER GAS & ELECTRIC CORPORATION  
R. E. Ginna Station, Fourth Interval Inservice Testing Program

RELIEF REQUEST VR-4

SYSTEM: Reactor Coolant Pressurizer

VALVES: 434, 435

CATEGORY: C

SAFETY CLASS: 1

FUNCTION: Pressurizer Safety Relief valves provide overpressurization protection for the reactor coolant system/pressurizer.

TEST REQUIREMENT: Determination of operation and electrical characteristics of position indication shall be done after maintenance or set pressure adjustment for Class 1 safety valves (Paragraph I-7310(f) of Appendix I of ASME OM Code-1998).

BASIS FOR RELIEF: These valves are mechanical spring-actuated valves with an externally-mounted LVDT stem position indicator. The position indicator must be removed in order to permit removal of the safeties each refueling outage for shipment to an off-site vendor for set pressure testing. It would be necessary to intentionally challenge RCS pressure limits to actuate these safety valves in order to perform position indication testing. Also, if these safety valves were actuated for a position indication test following re-installation, they would again need to be retested to ensure the set pressure has not been adversely affected. This involves increased testing and unnecessary radiation exposure to testing personnel.

ALTERNATE TESTING: These valves will be simulated to actuate using existing station calibration procedures. The procedure utilizes movement of the valve's LVDT coil (up/down) and verifies position via an alarm in the Control Room. Calibration of these position indicators is governed by plant calibration procedures and is performed on a refueling basis. These procedures verify that the proper clearance is obtained to ensure obturator motion is accurately represented.

### List of Regulatory Commitments

The following table identifies those actions committed to by Rochester Gas & Electric in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments. Please direct questions regarding these commitments to Mr. Thomas Harding, 585-771-3384.

REGULATORY COMMITMENT	DUE DATE
None	N/A