RGE AND
Always at Your Service

Robert C. Mecredy
Vice President
Nuclear Operations

March 18, 2004

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 Requests VR-1, VR-2, and VR-13
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 Richard J. Laufer, NRC, to Michael R. Kansler, Entergy Nuclear Operations, Inc., Subject: INSERVICE TESTING PROGRAM RELIEF REQUEST NOS. 47 AND 48, INDIAN POINT NUCLEAR GENERATING UNIT NO. 2 (TAC NOS. MB9111 AND MB9112), dated December 16, 2003.

Dear Mr. Clark:

Pursuant to 10 CFR 50.55a(a)(3)(i), the purpose of this letter is to request relief for the Ginna Station ASME Section XI Inservice Testing Program. The revised VR-1 and VR-2 (currently approved by Reference 1) request relief from the American Society of Mechanical Engineers / American National Standards Institute, Operation and Maintenance of Nuclear Power Plants, OM-1987, Part 10 (OM-10) exercising requirements for check valves. Relief is requested to allow alternative valve disassembly and inspection on a frequency of once during each operating cycle in lieu of every refueling outage. The new VR-13 requests approval to extend the exercise interval for manual valves within the scope of OM-10 from every quarter to 2 years, as proposed in Federal Register Vol. 67, Number 187 dated September 26, 2002.

VR-1 and VR-2 are similar to RR-47 at Indian Point Unit No. 2, which was approved by the NRC in Reference 2. VR-13 is similar to RR-48 at Indian Point Unit No. 2, which was also approved by the NRC in Reference 2.

The subject relief requests and bases are provided in Attachment 1.

No new commitments are being made in this letter.

RG&E requests NRC approval of these relief requests by September 30, 2004. If you should have any questions regarding this submittal, please contact Mr. Thomas Harding, 585-771-3384.

Very truly yours,

Robert C. Mecredy

attachment

xc: Mr. Robert Clark (Mail Stop O-8-C2)
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Attachment 1
Relief Request VR-1, VR-2, VR-13

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

RELIEF REQUEST NO. VR - 1

SYSTEM:	Emergency Diesel Generator Fuel Oil
VALVES:	5960A, 5960B
CATEGORY:	C
SAFETY CLASS:	3
FUNCTION:	These check valves open to provide a flow path for overflow from the fuel oil day tank to the fuel oil storage tank. These valves close to prevent reverse flow into the fuel oil day tank during recirculation of the fuel oil storage tank.
TEST REQUIREMENT:	Check valves shall be exercised at least once every three months, except as provided by OM-10, 4.3.2.1.
BASIS FOR RELIEF:	Relief is requested to disassemble, full stroke exercise and inspect one check valve on a rotating basis, at a frequency of each operating cycle (24 months) in lieu of during each refueling outage. This is to allow the surveillance requirement to be met with the plant online. The following underscore the usefulness and applicability of an online testing approach:

1. The design of the system is such that either emergency diesel generator can be isolated and the check valve disassembled with the plant online.

2. Performing the inspection with the plant online reduces outage complexity.

3. The check valves are located in an area where performance of the disassembly coupled with other major outage work increases the potential development of error-likely situations in work control and reassembly processes.

4. The check valve disassembly and inspection activities can be completed within 50% or less of the associated system Technical Specification allowed outage time.

5. An acceptable testing frequency can be maintained separately without being tied directly to a refueling outage. Inservice testing on a frequency that maintains the acceptable time period between testing activities during the operating cycle is consistent with the intent of OM-10 and GL 89-04.

6. The number of tests to be performed using either the outage or online frequency statements should be approximately equivalent. Thus, an equivalent level of quality and safety is maintained.

ALTERNATE TESTING: One valve will be disassembled, full-stroke exercised and inspected once each operating cycle (24 months) on a rotating basis. If that valve fails, the remaining valve will be disassembled, full-stroke exercised and inspected for operability at that same time. (re: Generic Letter 89-04, Attachment 1 - Position 2)

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

RELIEF REQUEST NO. VR - 2

SYSTEM:	Standby Auxiliary Feedwater
VALVES:	9627A, 9627B
CATEGORY:	C
SAFETY CLASS:	3
FUNCTION:	These service water suction check valves close to prevent reverse flow from Standby Auxiliary Feedwater (SAFW) System piping back into the Service Water (SW) System and open to provide a flow path for service water to the SAFW pumps.
TEST REQUIREMENT:	Check valves shall be exercised at least once every three months except as provided by OM-10, 4.3.2.1.
BASIS FOR RELIEF:	Relief is requested to disassemble, full stroke exercise and inspect one check valve on a rotating basis, at a frequency of each operating cycle (24 months) in lieu of during each refueling outage. This is to allow the surveillance requirement to be met with the plant online. The following underscore the usefulness and applicability of an online testing approach:

1. The design of the system is such that either Standby Auxiliary Feedwater pump can be isolated and the check valve disassembled with the plant online.

2. Performing the inspection with the plant online reduces outage complexity.

3. The check valves are located in an area where performance of the disassembly coupled with other major outage work increases the potential development of error-likely situations in work control and reassembly processes.

4. The check valve disassembly and inspection activities can be completed within 50% or less of the associated system Technical Specification allowed outage time.

5. An acceptable testing frequency can be maintained separately without being tied directly to a refueling outage. Inservice testing on a frequency that maintains the acceptable time period between testing activities during the operating cycle is consistent with the intent of OM-10 and GL 89-04.

6. The number of tests to be performed using either the outage or online frequency statements should be approximately equivalent. Thus, an equivalent level of quality and safety is maintained.

ALTERNATE TESTING: Partial stroke exercising will be performed each quarter. One valve will be disassembled, full-stroke exercised and inspected each operating cycle (24 months) on a rotating basis. If that valve fails, the remaining valve will be disassembled, full-stroke exercised and inspected for operability at that same time. (re. Generic Letter 89-04 - Position 2).

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

RELIEF REQUEST NO. VR - 13

SYSTEM:	Various.
VALVES:	Manual valves.
CATEGORY:	A and B Active.
SAFETY CLASS:	2 and 3.
FUNCTION:	These manual valves provide containment isolation, cross-tie and isolation capability among other functions.
TEST REQUIREMENT:	Active Category A and B valves shall be tested nominally every 3 months, except as provided by paragraphs 4.2.1.2, 4.2.1.5 and 4.2.1.7 per OM-10, 1988 Addenda to OM-1987, Paragraph 4.2.1.1.
BASIS FOR RELIEF:	The extension of exercising manual valves from every quarter to every 5 years has been evaluated by the OM code committee, found acceptable, and incorporated into the 1999 Addenda and 2000 Addenda of the OM code. The USNRC stated the following for 10 CFR 50.55(a) in the Federal Register/Vol. 67, Number 187, dated September 26, 2002: "(vi) Exercise interval for manual valves. Manual valves must be exercised on a 2-year interval rather than the 5-year interval specified in paragraph ISTC-3540 of the 1999 Addenda through the latest edition and addenda incorporated by reference in paragraph (b) (3) of this section, provided that adverse conditions do not require more frequent testing."
ALTERNATE TESTING:	These manual valves will have an exercise interval of 2-years, provided that adverse conditions, as defined in the OM Code, do not require more frequent testing.