

June 15, 2004

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

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION REGARDING R. E. GINNA
NUCLEAR POWER PLANT RELIEF REQUESTS VR-1, VR-2, AND VR-13 FOR
THE FOURTH 10-YEAR INTERVAL INSPECTION (TAC NO. MB2393)

Dear Dr. Mecredy:

By letter dated March 18, 2004, Rochester Gas & Electric Corporation requested relief from the American Society of Mechanical Engineers/American National Standards Institute, Operation and Maintenance Standard Part 10, (OM-10) for Relief Requests VR-1, VR-2, and VR-13. Relief Requests VR-1 and VR-2 request that valve disassembly and inspection be done on a frequency of once each operating cycle (24 months) in lieu of every refueling outage. Relief Request VR-13 requests approval to extend the exercise interval for manual valves within the scope of OM-10 from every quarter to every 2 years, as proposed in *Federal Register* Vol. 67, Number 187 (67 FR 187) dated September 26, 2002.

The Nuclear Regulatory Commission (NRC) staff has reviewed the information and based on our review, we have determined that additional information is required in order for the staff to complete its review. Enclosed is the NRC staff's request for additional information (RAI). This RAI was discussed with your staff on April 26, 2004, and it was agreed that your response would be provided 30 days from the date of this letter.

Sincerely,

/RA/

Robert Clark, Project Manager, Section 1
Project Directorate 1
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-244

Enclosure: RAI

cc w/encl: See next page

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R.E. Ginna Nuclear Power Plant

cc:

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REQUEST FOR ADDITIONAL INFORMATION

R. E. GINNA NUCLEAR POWER PLANT

RELIEF REQUESTS VR-1, VR-2, AND VR-13

Rochester Gas & Electric Corporation requested relief from American Society of Mechanical Engineers/American National Standards Institute, Operation and Maintenance Standard Part 10, (OM-10) for Relief Requests VR-1, VR-2, and VR-13 for the Fourth 10-year Interval Inservice Testing (IST) Program. Relief Requests VR-1 and VR-2 request that valve disassembly and inspection be done on a frequency of once each operating cycle (24 months) in lieu of every refueling outage.

Relief Requests VR-1, Revision 0 and VR-2, Revision 0 were previously authorized by NRC on June 13, 2000 (TAC No. MA7265). As authorized, the licensee may use the alternative to sample, disassemble, and inspect (on a rotating bases) one of the two check valves in the diesel generator and auxiliary feedwater systems, at a frequency of once each refueling outage (every 18 months).

In VR-1, Revision 1 and VR-2, Revision 1, the licensee requested to use the alternative to sample, disassemble, and inspect (on a rotating basis) one of the two check valves in the diesel generator and auxiliary feedwater systems, at a frequency of once each operating cycle (24 months). However the Ginna's refueling outage is 18 months, although the Technical Specification states that refueling outage duration may be up to 24 months.

The Nuclear Regulatory Commission (NRC) staff has completed its preliminary review and has determined that the following additional information (RAI) for Relief Requests VR-1 and VR-2 is needed to complete its review

Relief Request No. VR-1, Revision 1

RAI 1: The licensee states under Relief Request VR-1 "Basis for Relief" Item No. 1, "The design of the system is such that either emergency diesel generators can be isolated and the check valve disassembled with the plant online." Whereas in previously approved Relief Request VR-1 dated June 13, 2000, the licensee stated under "Basis for Relief," "During any mode of plant operation there is no practical means to exercise these valves. The valve closure cannot be verified due to system design. To perform a valve closure verification would require disassembly of mechanical joints in the piping, which would place the diesel in an inoperable condition." The licensee's statements for the same valves under Relief Request VR-1, Revision 0 and VR-1, Revision 1 appears to be contradicting. (a) Please explain, why the testing that was impractical previously can now be performed. (b) Also, if online testing of check valves 5960A/B is practical, then provide the reasoning for not testing these valves at least once every three months as required by the OM-10, para 4.3.2.1.

RAI 2: Please identify what specific paragraph of the OM-10 Standard you are requesting relief (e.g. paragraph 4.3.2.4(c) etc.)

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RAI 3: Please identify and provide the sizes of the check valves for which relief is requested.

RAI 4: Inservice testing of Emergency Diesel Generator Fuel Oil check valves 5960A and 5960B on a rotating basis or grouping may be performed when both valves are the same size, manufacturer, model number, and material of construction. Please provide the information necessary to verify that both valves 5960A and 5960B are the same size, manufacturer, model number, and material of construction.

RAI 5: The Relief Request does not address the safety and risk significance of on-line IST of the check valves. Please address (either in a qualitative or quantitative manner) the potential risk of disassembly and inspection of the check valves on-line compared to the risk when the plant is shutdown.

RAI 6: Provide sufficient information for NRC staff to reach a safety or risk determination with regards to isolation of these check valves when testing on-line. Also provide copies of drawings (P&IDs) showing check valves and isolation valves and provide details how isolation of these check valves will be established.

RAI 7: Provide the leak testing experience and leak tightness reliability of the associated isolation valves and the potential consequences of a loss of isolation capability during disassembly, inspection, and manual exercising of check valves 5960A and 5960B when the plant is on line.

RAI 8: Based on the risk significance discussed in RAI 5 above, discuss what preventive or compensatory measures are necessary to maintain safety and minimize risk while performing on-line IST.

Relief Request No. VR-2

RAI 1: The licensee states under Relief Request VR-2 "Basis for Relief" Item No. 1, "The design of the system is such that either standby auxiliary feedwater pump can be isolated and check valve disassembled with the plant online." Whereas in previously approved Relief Request VR-2 dated June 13, 2000, the licensee stated under "Basis for Relief," "Full-stroke exercising cannot be accomplished during power operation or cold shutdown as this would introduce service water to standby auxiliary feedwater system. Service water does not meet purity requirements for the system or steam generators. Service water would be supplied to steam generators during the required quarterly pump tests if exercising valves 9627A/B was performed." The licensee's statements for same valves under Relief Request VR-2, Revision 0 and VR-2, Revision 1 appears to be contradicting. (a) Please explain, why the testing that was impractical previously can now be performed. (b) Also, if the online testing of check valves 9627A/B is practical, then provide the reasoning for not testing these valves at least once every three months as required by the OM-10, para 4.3.2.1.

RAI 2: Please identify what specific paragraph of the OM-10 Standard you are requesting relief (e.g. paragraph 4.3.2.4(c) etc.)

RAI 3: Please identify and provide the sizes of the check valves for which relief is requested.

RAI 4: Inservice testing of Standby Auxiliary Feedwater check valves 9627A and 9627B on a rotating basis or grouping may be performed when both valves are the same size , manufacturer, model number and material of construction. Please provide the information necessary to verify that both valves 9627A and 9627B are the same size , manufacturer, model number and material of construction.

RAI 5: The Relief Request does not address the safety and risk significance of on-line IST of the check valves. Please address (either in a qualitative or quantitative manner) the potential risk of disassembly and inspection of these check valves on-line compared to the risk when the plant is shutdown.

RAI 6: Provide sufficient information for NRC staff to reach a safety or risk determination with regards to isolation of these check valves when testing on-line. Also provide copies of drawings (P&IDs) showing check valves and isolation valves and provide details how isolation of these check valves will be established.

RAI 7: Provide the leak testing experience and leak tightness reliability of the associated isolation valves and the potential consequences of a loss of isolation capability during disassembly, inspection, and manual exercising of check valves 9627A and 9627B when the plant is online.

RAI 8: Based on the risk significance discussed in RAI 5 above, discuss what preventive or compensatory measures are necessary to maintain safety and minimize risk while performing on-line IST.

Note: The OM-10 para 4.2.1.1(e) states that “if exercising is not practicable during plant operation or cold shutdowns, it may be limited to full-stroke during refueling outage.” Therefore, the inservice testing (IST) of the check valves must coincide with refueling outage of 18 months. If the licensee changes refueling outage to 24 months as allowed by the Technical Specification, the IST of these valves must coincide with the refueling outage of 24 months. This change can be done without any additional relief requests for these valves.