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ZIEMANN,D.L. OPERATING REACTORS BRANCH 2

SUBJECT: IN RESPONSE TO 781128 LTR,CONCLUDES CONTAINMENT VENTILATION CIRCUITRY & PROCEDURES RE USE ARE ADEQUATE.

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LEON D. WHITE, JR.
VICE PRESIDENT

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March 30, 1979

Director of Nuclear Reactor Regulation
Attention: Mr. Dennis L. Ziemann, Chief
Operating Reactors Branch No. 2
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Review of Safety Actuation Circuits With Overrides
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Ziemann:

Your letter of November 29, 1978 requested that we perform a review of all safety actuation signal circuits which incorporate manual override features. Our letter of February 16, 1979 provided the results of that review. The purpose of this letter is to supplement and amplify the information on the containment ventilation isolation circuitry which has previously been presented.

The containment ventilation isolation circuitry and the reset function were described in our previous letter. The isolation signal is generated either by safety injection (SI) or high containment radiation alarm on containment radiation monitors. Once a signal is generated, the isolation function is locked in and can only be cleared through use of the reset function, even if the initiating signal has been cleared. Further, once a high radiation signal is generated, the signal itself is locked in and must be cleared. This is not cleared by the containment ventilation isolation reset.

As stated in our previous letter the reset function is not annunciated. However, the signals that generate a containment ventilation isolation signal are annunciated. The position of the purge valves is indicated by lights on the control board. Hence, a combination of an isolation signal (annunciated) and a lack of a close light for the respective valve is positive indication the reset function has been actuated.

The reset switch is a key lock switch and its use is covered by strict administrative controls. Situations in which it might be required are as follows. If a spurious S.I. or high radiation signal were to generate an isolation signal, it would be necessary

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to use the switch to clear the isolation signal. Before using the reset, however, the plant operator would clear the spurious signal. Thus, when the reset was employed, it would momentarily block the signals but following release would not block subsequent signals. Procedural precautions alert the operator to the fact that the spurious signal should be cleared prior to using the reset. Strict control of the key for the reset under the Shift Foreman ensures that proper procedures are followed inasmuch as no single operator error can result in improper use of the reset function.

A second situation involving the use of the reset key switch is following the monthly test of the containment ventilation isolation circuitry. In this test, a simulated signal is input into the circuitry. Following completion of the test, the test signal is removed and cleared. Only after this is accomplished is the isolation signal cleared, again under strict administrative controls including decisions by two operators.

A third circumstance which could involve use of the key switch is an actual high radiation signal which isolates containment when purging is desired. Purging could be accomplished by use of the reset function thereby overriding the high radiation signal, however, this is not permitted without a detailed evaluation. In addition, to the best of our knowledge, this has never occurred in nearly ten years of plant operation. The practice, enforced by procedure, in this case is to attempt to clear the high radiation signal in case it is a spurious signal. If it is not a spurious signal, the set point of the monitor would be evaluated and raised, while ensuring that all regulatory requirements for release concentrations (e.g., 10 CFR Part 20 limits) are met. This would permit the high radiation signal to be cleared. Once the high radiation signal were cleared, the ventilation isolation signal could be cleared by momentary use of the reset key switch. Plant procedures for this situation, will explicitly provide information as to the function of the reset function and the need to thoroughly understand and evaluate the situation at hand before using the reset. Again, it has never been necessary, to the best of our knowledge, to use the reset to override an isolation signal in our nearly ten years of plant operation.

Finally, it may be necessary to use the reset function in order to purge containment to limit hydrogen buildup in containment following a design basis loss of coolant accident (LOCA). Following a LOCA, both a high radiation and SI signal will exist. If, based on hydrogen sampling of the containment atmosphere, it is necessary to purge, the plant operator is provided detailed precautions on use of the reset. He is directed to place all valve position controllers in the close position so that no valve will open on initiation of the reset. Then the operator actuates

the reset. Finally, he initiates containment purge. It should be noted that purging to control the post-accident hydrogen concentration is not necessary until at least several days after the event.

In conclusion the Ginna containment ventilation isolation circuitry and procedures regarding its use are adequate. This is based on the detailed procedural controls which have been implemented, the physical control of the reset key switch which involves at least two operators to use, and ten years of successful plant operation.

Very truly yours,

Leon D. White, Jr.

Leon D. White, Jr.

LDW:np