Docket No. 50-244

NOV 21 1979

LICENSEE: Rochester Gas and Electric Corporation

FACILITY: R. E. Ginna Nuclear Power Plant

SUBJECT: SUMMARY OF NOVEMBER 9, 1979 PHONE CONVERSATION REGARDING LESSONS LEARNED IMPLEMENTATION

During a phone conversation on November 9, 1979, the NRC Lessons Learned Implementation Team Leader discussed with the licensee its October 17, 1979 response to our September 13, 1979 letter.

The team leader informed the licensee of those lessons learned items for which the licensee's proposed schedule for implementation is unacceptable. These items, along with the proposed and required completion dates, are listed in Enclosure 1.

The team leader informed the licensee of those items for which the proposed action does not appear to comply with the lessons learned requirement. These items and their associated deficiencies are listed in Enclosure 2.

The team leader also informed the licensee of those items for which further clarification of the licensee's commitment is necessary to demonstrate compliance with the lessons learned requirements. These items and the associated team questions are listed in Enclosure 3.

By letter dated October 30, 1979, we provided additional clarification of the lessons learned requirements to all licensees. We also requested that within 15 days licensees justify proposed actions not in complete agreement with the staff's requirements and improve the implementation schedule where it differed from the staff's requirements. During this phone conversation we informed the licensee that those items listed in Enclosure 1 and 2 should be addressed in their response. In addition, the licensee agreed to provide the information requested in Enclosure 3 in its response to our October 30, 1979 letter or as soon thereafter as possible.

Original signed by
James J. Shea, Project Manager
Operating Reactors Branch #2
Division of Operating Reactors

ccp memo

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ENCLOSURE 1

GINNA

ITEMS THAT DO NOT MEET LESSONS LEARNED IMPLEMENTATION SCHEDULE

1. Section 2.1.4 - Containment Isolation Provisions

   Modifications to the isolation signal to prevent automatic reopening of containment isolation valves are scheduled to be completed during the March 1980 refueling outage. This schedule is not acceptable and should be revised to meet the January 1, 1980 deadline.

2. Containment Water Level Monitor, Containment Hydrogen Indication

   Installation of the containment water level and hydrogen concentration indicators is scheduled for implementation "dependent upon plant availability". This schedule should be revised to assure implementation on or before the January 1, 1981 deadline.

3. Reactor Coolant System Venting

   Installation of the reactor coolant system vents is scheduled "dependent upon plant availability". This schedule should be revised to assure implementation on or before the January 1, 1981 deadline.

4. Section 2.1.6.B - Shielding Design Review

   There may be a selected number of modifications that can be indicated in the integrated assessment of SEP. It is our position that the decision as to whether or not shielding modifications are incorporated into the SEP Program may be delayed until the design review is completed on or before January 1, 1980.

5. Section 2.1.8.b - High Range Radiation Monitors

   Your response should commit to installing the high-range in-containment radiation monitors by the lessons learned implementation date of January 1, 1981.

ENCLOSURE 2

GINNA

PROPOSED ACTIONS THAT DO NOT APPEAR
TO COMPLY WITH LESSONS LEARNED REQUIREMENTS

1. Section 2.1.3.a - Direct Indication of Valve Position

   a. The current PORV position indication must be upgraded to meet the qualification and reliability requirements as noted in the Harold R. Denton letter of October 30, 1979 to operating reactors.

   b. The staff does not accept temperature indication as an unambiguous means of determining valve position. Lessons learned from TMI indicate that temperature is not an unambiguous indication of valve closure and may not be a positive indication of valve opening.

2. Section 2.1.5.c - Recombiner Procedures

   In the Ginna submittal dated October 17, 1979, it is stated that procedures on the use of hydrogen recombiners are presently available. These procedures should be reviewed for adequacy.

ENCLOSURE 3

GINNA

CLARIFICATION OF PROPOSED ACTIONS ARE NEEDED IN ORDER TO VERIFY CONFORMANCE TO LESSONS LEARNED REQUIREMENTS

1. Section 2.1.1 - Emergency Power Supply Requirements

Additional clarification of the pneumatic system that provides motive power for PORV 430 and 431 c will be required:

a. State whether the air supply systems for the PORVs meet the single failure criterion.

b. State how many cycles of the PORVs are accommodated by the air system accumulators.

2. Section 2.1.3.b - Instrumentation for Detection of Inadequate Core Cooling

The additional information for the subcooling meter as detailed in the Harold R. Denton letter of October 30, 1979, should be submitted.

3. Section 2.1.4 - Containment Isolation Provisions

a. The Ginna submittal dated April 28, 1979 states that containment isolation is initiated either manually or by an automatic safety injection signal. Additional information will be required on or before the January 1, 1980 deadline to support the Ginna conclusion (submittal dated October 17, 1979) that containment isolation occurs on diverse signals.

b. A list of essential systems at the Ginna plant and the basis for selection of each essential system should be provided by the January 1, 1980 deadline.

c. Further clarification will be needed on the isolation of non-essential systems by the containment isolation signal. Specifically, in the Ginna submittal dated June 22, 1979, a distinction is made between penetrations isolated by the containment isolation signal (CIS) and penetrations isolated by the containment ventilation isolation signal (CVIS). Provide details on the differences (e.g., actuation method) between the CI and the CVIS.

4. Section 2.2.2.b - Onsite Technical Support Center

   Additional clarification for the interim onsite technical support center is required. This clarification should address habitability, location, availability of drawings and records, communication links with the control room and with offsite response centers, emergency lighting, and availability and display of plant technical information.

5. Section 2.1.6.a - Systems Integrity

   Your response should include a commitment to provide a summary description of the leakage reduction program and a quantitative assessment of leak rates in accordance with the October 30, 1979 Harold R. Denton letter to All Operating Nuclear Power Plants.

6. Section 2.1.8.a - Post-Accident Sampling Capability

   Your response should include a commitment to provide the capability for measuring the hydrogen concentration in the containment atmosphere and for determining dissolved gases in the primary coolant.

7. Section 2.1.8.b - High Range Radiation Monitors

   You should assess and report the capability to function as necessary under accident conditions. If this capability cannot be determined, the provisions for laboratory analysis should be provided.

8. Section 2.1.8.c - Improved Iodine Instrumentation

   You should determine and report the capability of the iodine monitoring system to function in accident conditions including high levels of noble gases.

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