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SUBJECT: Responds to 800223 ltr re LWR primary coolant sys pressure isolation valves.Need for surveillance or periodic testing being evaluated .Periodic check valve pressure integrity test program being developed.

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LEON D. WHITE, JR.
VICE PRESIDENT

TELEPHONE
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March 14, 1980

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

Subject: LWR Primary Coolant System Pressure Isolation Valves
R. E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Ziemann:

This letter is in response to a February 23, 1980 letter (received March 4, 1980) from Darrell G. Eisenhut to "All LWR Licensees" concerning the "LWR Primary Coolant System Pressure Isolation Valves". In that letter, it was requested that we provide information, within 20 days of receipt of the letter, in order to determine whether the Ginna license should be modified to require either continuous surveillance or periodic testing. Our responses to the questions raised in the NRC letter are as follows:

1. Describe the valve configuration at your plant and indicate if an Event V isolation valve configuration exists within the Class I boundary of the high pressure piping connecting PCS piping to low pressure system piping; e.g., (1) two check valves in series, or (2) two check valves in series with a MOV;

Response: This information was previously provided to the NRC staff during the review of SEP Topic V-11.A, "Requirements for Isolation of High and Low Pressure Systems," transmitted from L. D. White, Jr. to Mr. Dennis L. Ziemann on January 25, 1979. Only two arrangements are similar to the "Event V" configurations.

a) The high head safety injection to the cold leg has two check valves in series with an open MOV. However, the safety injection piping is 1500 psi piping, rather than low pressure piping. It also has a relief valve in the line which relieves back to the pressurizer relief tank inside containment. Since there is substantially more protection from an Event V in this arrangement

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than in the scenario described in WASH-1400, it will require further evaluation by RG&E to determine the need for providing any additional margins of safety, such as periodic testing or surveillance.

b) the low head safety injection system has one check valve and one normally closed MOV. This MOV receives a safety injection signal to open.

2. If either of the above Event V configurations exist at your facility, indicate whether continuous surveillance or periodic tests are being accomplished on such valves to ensure integrity. Also indicate whether valves have been known, or found, to lack integrity.

Response: At the present time there is no continuous surveillance or periodic testing on these valves to ensure pressure integrity. However, in the ten years of operation there has been no indication of any gross leakage in any of these check valves.

3. If either of the above Event V configurations exist at your facility, indicate whether plant procedures should be revised or if plant modifications should be made to increase reliability.

Response: As noted in Response 1a above, RG&E is evaluating the need to perform any continuous surveillance or periodic testing for the high head safety injection check valves.

For the low head safety injection check valves (853 A, B), we are presently in the process of developing a periodic check valve pressure integrity test program, to be used during startups prior to exceeding the RHR system design pressure. When the details of this periodic testing program are finalized, it will be incorporated in the plant procedures.

The programs for check valve surveillance or testing for the high head safety injection lines (if needed) and the low head safety injection lines will be implemented prior to startup following our Spring 1980 refueling outage.

Very truly yours,

LDWhite, Jr.

L. D. White, Jr.

Subscribed and sworn to me

on this 14th day of March 1980.

Gary L Reiss

GARY L. REISS
NOTARY PUBLIC, State of N. Y. Monroe Co.
My Commission Expires March 30, 1981