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SUBJECT: Forwards resolution of environ qualification issues noted in Franklin Research Ctr 820528 Technical Evaluation Rept TER C5257-454 & NRC 821213 SER.Discussion of conformance w/10CFR50.49 encl.

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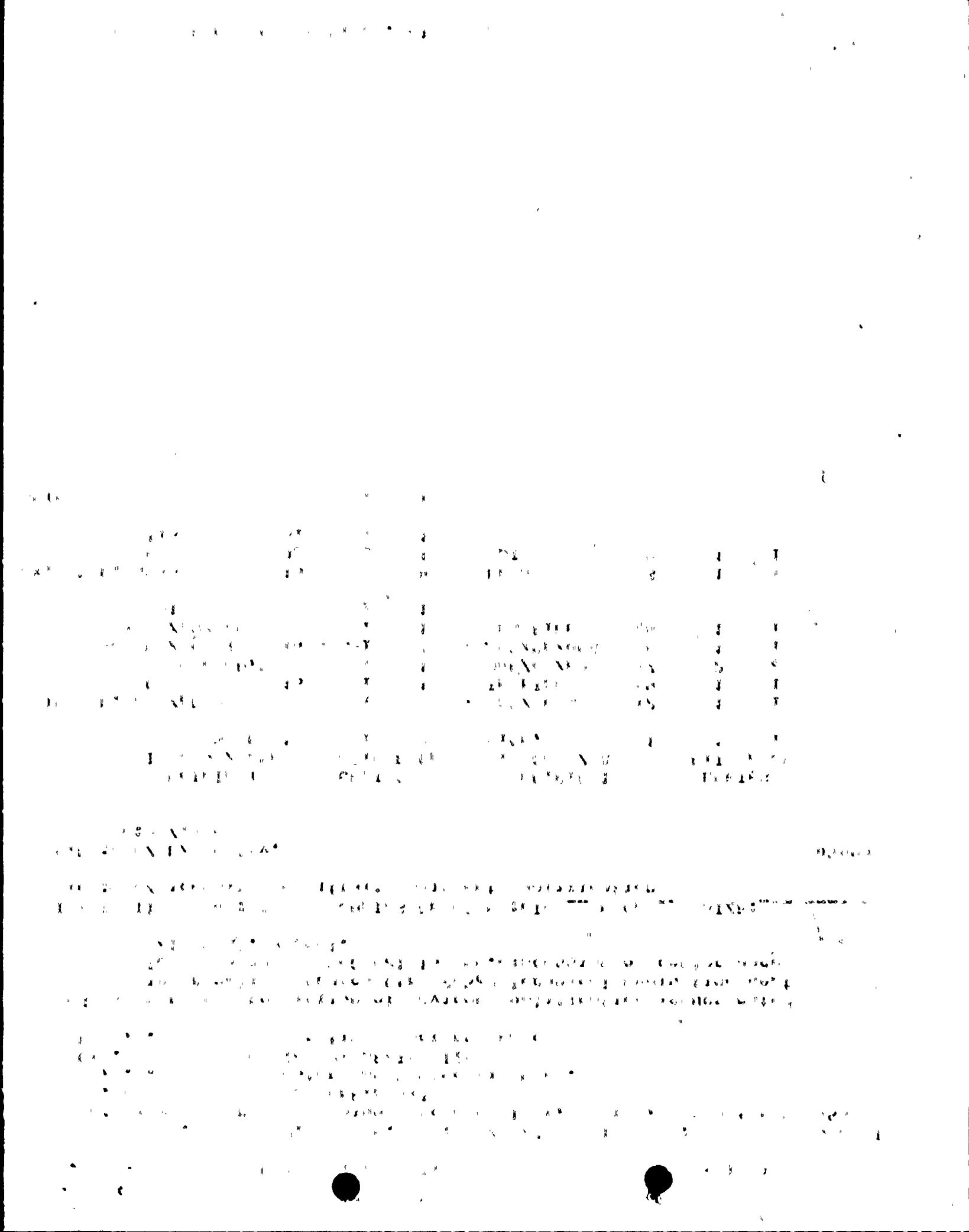

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August 30, 1984

Director of Nuclear Reactor Regulation
Attention: Mr. Walter Paulson
Operating Reactors Branch No. 5
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject:
Environmental Qualification of Electrical Equipment
R. E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Paulson:

This letter concerns the resolution of environmental qualification issues noted in the Franklin Research Center Technical Evaluation Report, FRC TER C5257-454, dated May 28, 1982, and transmitted with the NRC's Safety Evaluation Report by letter dated December 13, 1982. This resolution of issues is provided in Enclosure 1.

Also provided, as Enclosure 2, is a discussion of RG&E conformance with the Environmental Qualification Regulation, 10CFR50.49, in particular paragraphs (b)(1), (b)(2), and (b)(3). Since RG&E has installed all equipment required to be environmentally qualified at this time, there are no Justification for Continued Operation included in this submittal. This information had previously been discussed in a meeting between RG&E and the NRC on April 17, 1984.

Very truly yours,

Roger W. Kober

Roger W. Kober

Enclosures

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Enclosure 1: Resolution of Issues Defined in FRC TER C5257-454

TER ITEM NO.	DESCRIPTION	NRC CATEGORY	DEFICIENCIES	PROPOSED RESOLUTION
1	Solenoid Valves (SOV's) for FW Control Valves	I.b	Documentation, Similarity, Aging, Life/Replacement, Aging Program, Environmental Envelope	Replacement with Qualified ASCO Solenoid Valves
2	SOV's for Feedwater Bypass Valves	I.b	Documentation, Similarity, Aging, Life/Replacement, Aging Program, Environmental Envelope	Replacement with Qualified ASCO Solenoid Valves
3	SOV's for Nash Valves	III.b	Not in Scope	---
4	SOV's for Main Steam Isolation Valves - Supply	I.b	Documentation, Similarity, Aging, Life/Replacement, Aging Program, Environmental Envelope	Replacement with Qualified Valcor Solenoid Valves
5	SOV's for Main Steam Isolation Valves - Vent	I.b	Documentation, Similarity, Aging, Life/Replacement, Aging Program, Environmental Envelope	Replacement with Qualified Valcor Solenoid Valves
6	SOV's for Containment Recirculation Dampers	I.b	Documentation, Similarity, Aging, Life/Replacement, Aging Program, Environmental Envelope	Replacement with Qualified ASCO Solenoid Valves
7	SOV's for SI Recirculation Valves	III.b	Not in Scope	---
8	SOV's for Containment Purge Valves	I.b	Documentation, Aging, Life/ Replacement, Environmental Envelope, Radiation	Replacement with Qualified ASCO Solenoid Valves
9	SOV's for Containment Depressurization Valves	I.b	Documentation, Aging, Life/ Replacement, Environmental Envelope, Radiation	Replacement with Qualified ASCO Solenoid Valves
10	SOV's for Pressurizer PORV's	II.a	Similarity not Established	Similarity Analysis Provided By Ref. 77
11	SOV's for Control Room Dampers	III.b	Not in Scope	---
12	Limitorque MVA's SMB-2 for MOV 841, 865	III.a	Exempt	---

TER ITEM NO.	DESCRIPTION	NRC CATEGORY	DEFICIENCIES	PROPOSED RESOLUTION
13	Limitorque MVA's SMB-00 for MOV's 826A-D; 896 A,B	II.c	Qualified Life	WCAP 7410-L, Ref. 18, Specifies 40 Yr. Life
14	Limitorque MVA's SMB-00 for MOV's 825 A,B	II.c	Qualified Life	WCAP 7410-L, Ref. 18, Specifies 40 Yr. Life
15	Limitorque MVA's SMB-00 for MOV's, 4007, 4008, 4027, 4028; 4000 A,B	III.a	Exempt	Note 1 on page 4b of the Franklin TER has been resolved by submittal of RG&E letter of December 15, 1983, from Maier to Crutchfield, "Environmental Qualification".
16	Limitorque MVA's SMB-00 for MOV's 850 A,B; 857 A,B,C; 856; 860 A-D; 704 A,B	II.c	Qualified Life	WCAP 7410-L, Ref. 18, Specifies 40 Yr. Life
17	Limitorque MVA's SMB-00 for MOV's 851 A,B; 878 B,D; 878 A,C	III.a	Exempt - 851 A,B; 878 B,D Conditional - 878 A,C	878 A,C are locked-closed. This has been found acceptable by the NRC. See RG&E letter of February 1, 1983 from Maier to Crutchfield, "Environmental Qualification".
18	Limitorque MVA's SMB-1 for MOV's 852 A,B	II.c	Qualified Life	WCAP 7410, Reference 18, Specifies 40 Yr. Life
19	Limitorque MVA's SMB-00 for MOV's 9703 A,B; 9704 A,B; 9710 A,B	III.b	Not in Scope	---
20	Auxiliary Feedwater Pump Motors	III.b	Not in Scope	---
21	Containment Spray Pump Motors	III.b	Not in Scope	These motors can see a harsh radiation environment from Post-LOCA recirculation. Reference 69 provides radiation qualification to 1×10^7 Rads, which is greater than the worst-case 2.8×10^6 Rads calculated for this location.

TER ITEM NO.	DESCRIPTION	NRC CATEGORY	DEFICIENCIES	PROPOSED RESOLUTION
22	Component Cooling Water Pump Motors	III.b	Not in Scope	---
23	Residual Heat Removal Pump Motors	III.b	Not in Scope	These motors could see a harsh radiation environment from Post-LOCA recirculation. Ref. 69 provides qualification data to 1×10^7 Rads, which is substantially higher than the worst-case radiation dose of 2.8×10^6 Rads.
24	Auxiliary Feedwater Pump Motors	III.a	Exempt	Note 1 on page 46 of the Franklin TER has been resolved by RG&E letter of December 15, 1980, from Maier to Crutchfield, "Environmental Qualification".
25	Safety Injection Pump Motors	III.b	Not in Scope	These motors could see a harsh radiation environment from Post-LOCA recirculation. Ref. 69 provides qualification data to 1×10^7 Rads, which is substantially higher than the worst-case radiation dose of 2.8×10^6 Rads.
26	Service Water Pump Motors	III.b	Not in Scope	---
27	Hydrogen Recombiner Blower Motors	II.c	Qualified Life	WCAP 7410-L notes motor was qualified 7-year continuous duty operation at 150°C. Since motor is used only for periodic operability tests, and is located in an ambient environment of about 50°C, it is judged that a 40-year qualified life is assured.

TER ITEM NO.	DESCRIPTION	NRC CATEGORY	DEFICIENCIES	PROPOSED RESOLUTION
				Note: The motor-to-lead splice has been replaced with a qualified Raychem splice sleeve.
28	Charging Pump Motors	III.b	Not in Scope	---
29	RHR Cooling Fan Motors	II.a	Documentation Similarity	RG&E has reviewed the referenced qualification document, Ref. 69, Westinghouse Report 71-1C2-RADMC-R1, and concluded that all materials which could have been used in the motors are qualified for at least 1×10^7 Rads, which is greater than the worst-case 2.8×10^6 Rads.
			Qualified Life	Per Ref. 69, an expected operating life of 20 years is noted. Since these motors are not used continuously, and are operated at their maximum rating, a life of 40 years can be expected, considering the routine maintenance program in place at Ginna Station.
30	Cooling Fans for Charging, Containment Spray, and Safety Injection Pump Motors	II.a	Documentation Similarity	RG&E has reviewed the referenced qualification document, Ref. 69, Westinghouse Report 71-1C2-RADMC-R1, and concluded that all materials which could have been used in the motors are qualified for at least 1×10^7 Rads, which is greater than the worst-case 2.8×10^6 Rads.

TER ITEM NO.	DESCRIPTION	NRC CATEGORY	DEFICIENCIES	PROPOSED RESOLUTION
			Qualified Life	Per Ref. 69, an expected operating life of 20 years is noted. Since these motors are not used continuously, and are operated at their maximum rating, a life of 40 years can be expected, considering the routine maintenance program in place at Ginna Station.
31	Crouse-Hinds Electrical Containment Penetrations	I.a	Qualified	---
32	Westinghouse Electrical Containment Penetrations	I.a	Qualified	---
33	Westinghouse Terminal Blocks	I.b	Aging Degradation Qualified Life/Replacement Spray, Submergence, Radiation	These terminal blocks have been replaced by fully-qualified Raychem sleeves.
34	Kerite Power Cable in Containment	II.a	Similarity, Radiation	Reference 78 provides the results of qualification testing of Kerite cable, including radiation dose of 2×10^8 Rads, as well as a materials/sizing similarity evaluation. Based on this information, the Kerite cable is considered fully environmentally qualified. Note that the Beta Radiation issue is addressed by RG&E's qualification level of 2×10^8 Rads.

TER ITEM NO.	DESCRIPTION	NRC CATEGORY	DEFICIENCIES	PROPOSED RESOLUTION
35	Kerite Control Cable Inside Containment	II.a	Similarity Radiation	Reference 78 provides the results of qualification testing of Kerite cable, including radiation dose of 2×10^8 Rads, as well as a materials/sizing similarity evaluation. Based on this information, the Kerite cable is considered fully environmentally qualified. Note that the Beta Radiation issue is addressed by RG&E's qualification level of 2×10^8 Rads.
36	Kerite Cable Outside Containment	I.a	Qualified	---
37	Coleman Instrument Cable Inside Containment	II.a	Qualified Life, Radiation	Reference 51 states aging performed equivalent to 40 yr. Radiation qualification per Ref. 51 and 9/7/81 letter documents minimum of 4.1×10^7 Rads, which is greater than DOR guidelines of 2×10^7 Rads.
38	Coleman Cable Outside Containment	II.a	Qualified Life	IPCEA S-61-402 (Ref. 10) provides aging requirements for this cable. Since this cable is outside containment, and the only harsh environment is gamma radiation, aging is not a major concern.
			Radiation	Ref. 76 provides confirmation that the PVC cable is adequate for a radiation dose of 7×10^6 Rads, which is greater than the maximum expected radiation level at the cable location of 3×10^5 Rads.

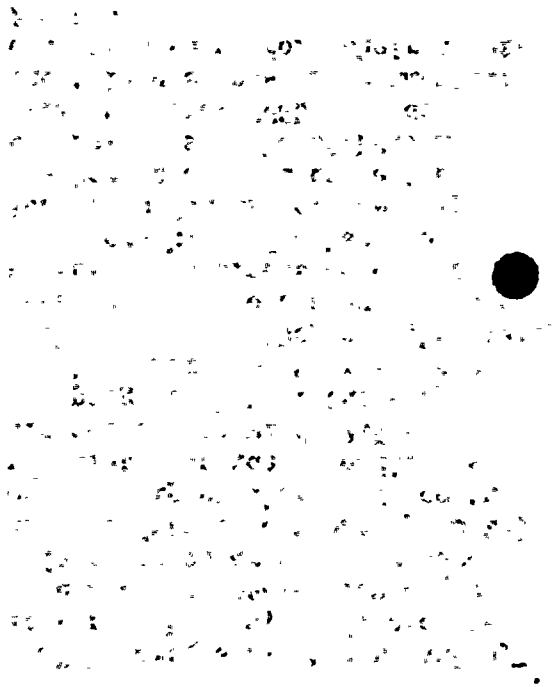
TER ITEM NO.	DESCRIPTION	NRC CATEGORY	DEFICIENCIES	PROPOSED RESOLUTION
39	Rome Cable Outside Containment	II.a	Qualified Life	IPCEA S-61-402 (Ref. 10) provides aging requirements for this cable. Since this cable is outside containment, and the only harsh environment is gamma radiation, aging is not a major concern.
			Radiation	Ref. 76 provides confirmation that the PVC cable is adequate for a radiation dose of 7×10^6 Rads, which is greater than the maximum expected radiation level at the cable location of 3×10^5 Rads.
40	General Cable Outside Containment	II.a	Qualified Life	IPCEA S-61-402 (Ref. 10) provides aging requirements for this cable. Since this cable is outside containment, and the only harsh environment is gamma radiation, aging is not a major concern.
			Radiation	Ref. 76 provides confirmation that the PVC cable is adequate for a radiation dose of 7×10^6 Rads, which is greater than the maximum expected radiation level at the cable location of 3×10^5 Rads.
41	RWST Level Transmitter	I.b	Aging Qualified Life/Replacement Aging Program	This transmitter has been replaced with a fully-qualified NE-10 series Foxboro transmitter.
42	RWST Level Switch	III.b	Not in Scope	The level switch has been replaced with a fully-qualified NE-10 series Foxboro transmitter.

TER ITEM NO.	DESCRIPTION	NRC CATEGORY	DEFICIENCIES	PROPOSED RESOLUTION
43	Steam Line Flow Transmitter	II.a	Documentation Similarity	These transmitters have been replaced with fully-qualified NE-10 series Foxboro transmitters.
44	Containment Pressure Transmitters	III.b	Not in Scope	These transmitters have been replaced with fully-qualified NE-10 series Foxboro transmitters.
45	Pressurizer Pressure Transmitters	I.b	Aging, Qualified Life/ Replacement, Aging Program, Spray, Submergence, Radiation, Test Sequence	These transmitters have been replaced with fully-qualified NE-10 series Foxboro transmitters.
46	Steam Line Pressure Transmitters	I.b	Aging, Qualified Life/Replacement, Aging Program	These transmitters have been replaced with fully-qualified NE-10 series Foxboro transmitters.
47	Pressurizer Level Transmitters	I.b	Aging, Qualified Life/ Replacement, Aging Program Spray, Submergence, Radiation, Test Sequence	These transmitters have been replaced with fully-qualified NE-10 series Foxboro transmitters.
48	Boric Acid Storage Tank Transmitters	II.c	Qualified Life	These transmitters perform their function prior to Post-LOCA sump recirculation. Further, they are located in an area which would not be subject to a harsh environment. Thus, these transmitters should be considered outside the scope of this review.
49	Steam Generator Level Transmitters	I.b	Documentation	These transmitters have been replaced with fully-qualified NE-10 series Foxboro transmitters.

TER ITEM NO.	DESCRIPTION	NRC CATEGORY	DEFICIENCIES	PROPOSED RESOLUTION
50	Resistance Temperature Detectors Inside Containment	II.a	Documentation, Aging, Qualified Life/Replacement, Aging Program, Environmental Envelope, Radiation, Test Sequence	The Hot Leg RTD's which supply input to the saturation meter have been replaced with fully-qualified Conax RTD's (see reference 79). The Cold Leg RTD's are not at this time used by RG&E as a primary safety-related input following an accident which would result in a harsh environment (it would not be considered a category 1 or 2 instrument per RG 1.97). If this situation changes during the RG 1.97 review, the Cold Leg RTD's will be treated appropriately (see 3/30/84 letter).
51	Batteries	III.b	Not in Scope	---
52	Diesel Generator Engine and Controls	III.b	Not in Scope	---
53	Generator and Controls	III.b	Not in Scope	---
54	DG Fuel Oil Transfer Pump Motor	III.b	Not in Scope	---
55	Reactor Containment Fan Cooler Motors	II.a	Similarity	The lead-to-cable splice has been replaced with fully-qualified Raychem splice sleeves. The Rotanium grease is no longer used. Chevron NRRG grease, with a radiation resistance of greater than 5×10^8 Rads, is used (see Ref. 80).

TER ITEM NO.	DESCRIPTION	NRC CATEGORY	DEFICIENCIES	PROPOSED RESOLUTION
				Note that the motor-to-lead splice is an integral part of the motor, and was qualified with the motor.
			Qualified Life/Replacement	WCAP 7410-L, Reference 18, specifies a 40-Year life for RCFC motor components, including insulation materials and lubricants.
			Radiation	The motor was qualified for a total radiation dose of 2×10^8 Rads, and is considered qualified for both gamma and beta radiation (see RG&E's letter of 2/1/83, item 55b).
				Another FRC concern related to dose rate. Since that time, Regulatory Guide 1.89 and NUREG/CR-2089 have concluded that standard gamma simulators can adequately duplicate damage from both ambient and accident radiation environments. Since these standard simulators were used in the qualification of the Ginna RCFC motors, the radiation qualification is considered fully acceptable.

TER ITEM NO.	DESCRIPTION	NRC CATEGORY	DEFICIENCIES	PROPOSED RESOLUTION
56	Reactor Trip Breakers	II.a	Documentation	WCAP-7706-L, submitted to NRC by letter of Nov. 6, 1981, provides a qualitative evaluation of the effects of adverse temperature and humidity conditions (p. 3-22) on the trip breakers. Since the postulated accident conditions are relatively mild (215°F, 0.8 psig, 100% RH), the trip breakers perform their function within seconds, they are physically located two floors away from the postulated accident condition (pipe crack), and subsequent long-term failure of the trip breakers could not cause the control rods to be withdrawn from the core, RG&E considers the trip breakers environmentally qualified to perform their safety function.
57	Reactor Coolant Pump Breakers	II.a	Documentation	These breakers are not subject to a harsh environment when the safety function is required (small break cold leg LOCA inside containment). These breakers are located in the Turbine Building. Further, FRC has stated that "from a strictly deterministic viewpoint, there is no objection to the licensee's response". RG&E considers this item to be not in the scope of the "harsh" environment qualification review.
58	I&C Cabinets/Controls	III.b	Not in Scope	---
59	Relay Racks	III.b	Not in Scope	---
60	Control Room HVAC	III.b	Not in Scope	---



TER ITEM NO.	DESCRIPTION	NRC CATEGORY	DEFICIENCIES	PROPOSED RESOLUTION
61	Cable Splices Inside Containment	I.a	Qualified	---
62	Containment Sump "B" Level Transmitters	II.a	Documentation	These transmitters have been replaced with fully-qualified transmitters (see Ref. 81).
63	Hydrogen Recombiner Igniter Exciter Units	I.b	Documentation	One parallel path for these pressure switches for each recombiner have been replaced with fully-qualified NE-10 series Foxboro transmitters.
64	NAMCO Limit Switches	II.a	Similarity	Similarity was established in RG&E's 2/1/83 letter, where the installed switches were identified as model EA180-11302, identical to those tested and fully environmentally qualified.
65	LVDT for Pressurizer Safety Valves Position Indication	I.b	Radiation	The new units, model no. 500XS-ZTR, have been installed. These are fully environmentally qualified, as noted in the Franklin TER.
66	Head Vent Valcor Solenoid Valves	II.a	Similarity	The installed valves are V52600-6042, which are qualified as noted by Reference 73.
67	Containment Pressure Transmitters	I.b	Documentation, Similarity, Aging, Qualified Life/Replacement, Aging Program	These transmitters have been replaced with fully-qualified NE-10 series Foxboro transmitters.

Enclosure 2: RG&E Compliance with 50.49

1. Paragraph (b)(1) of 10CFR50.49 requires that safety-related electrical equipment remain functional during and following design basis events, which are defined as conditions of normal operation, including anticipated operational occurrences, design basis accidents, external events, and natural phenomena. During the April 17 meeting between RG&E and the NRC, RG&E was requested to "...confirm by an auditable documentation trail that the post-accident harsh environment assumed for the purposes of the equipment qualification program envelopes the worst-case conditions, and those environmental profiles and assumptions have been approved by the NRC".

   A series of evaluations were performed for Ginna Station during the Systematic Evaluation Program, of all high and moderate energy line breaks and cracks, and equipment failures, which could result in a harsh environment inside and outside containment including the effects of flooding.Reference documents used to generate the list of required equipment included the FSAR, Technical Specifications, Emergency Procedures, P&ID's, and electrical distribution diagrams. The results of all these analyses, were evaluated in the designation of appropriate design basis conditions for RG&E's environmental qualification program. The complete list of safety-related electrical equipment considered by RG&E to require environmental qualification for a harsh environment is included in the Franklin TER C5257-454, except as supplemented by TMI items in RG&E's March 30, 1984 submittal. The design basis environmental qualification envelope was provided to FRC, and reviewed and found acceptable in Appendix A of the TER.

   For information and documentation purposes, the specific SEP topic Safety Evaluation Reports applicable to this review are:

   a. SEP Topic III-5.A, "Effects of Pipe Break On Structures, Systems, and Components Inside Containment".

   b. SEP Topic III-5.B, "Pipe Break Outside Containment".

   c. SEP Topic VI-2.D, "Mass and Energy Release for Possible Pipe Break Inside Containment".

   d. SEP Topic IX-3, "Station Service and Cooling Water Systems".

   e. SEP Topics XV-1, XV-2, XV-3, XV-4, XV-5, XV-6, XV-7, XV-8, XV-10, XV-12, XV-14, XV-15, XV-17, "Design Basis Events Accidents and Transients", September 4, 1981.

f. SEP Topics XV-2, XV-12, XV-16, XV-17, XV-20, "Design Basis Events", September 24, 1981 and March 3, 1982.

g. SEP Topic XV-19, Loss of Coolant Accidents (Radiological) September 29, 1981, and Loss of Coolant Accidents (System), October 2, 1981.

2. Paragraph (b)(2) of 10CFR50.49 requires assurance that non-safety-related electrical equipment will not fail under postulated environmental conditions such that it could prevent satisfactory accomplishments of the required safety functions by safety-related equipment.

RG&E has performed, through the Systematic Evaluation Program and other reviews, numerous evaluations of the possible effects of non-safety-related equipment on safety-related functions, as defined in 50.49. These evaluations, which have been reviewed and approved by the NRC, show that no adverse effect on the required safety functions will occur as a result of such interactions. During the course of these evaluations, auxiliary equipment connected electrically and/or mechanically to the required safety-related equipment was reviewed to determine if failures due to the postulated environmental conditions could adversely affect the required safety functions. Also, associated circuits were reviewed to assure that failure would not prevent the required safety functions, because of the existence of properly coordinated protective relays, circuit breakers, and fuses for electrical fault protection.

The following Safety Evaluation Reports or RG&E correspondence are among these considered applicable to the review:

a. SEP Topic III-12, "Environmental Qualification of Electrical Equipment", dated December 15, 1980 (considered acceptable in Franklin TER C5257-454, item 15 and 24).

b. SEP Topic III-10.A, "Thermal Overload Protection for Motor Operated Valves", SER dated August 3, 1981.

c. SEP Topic IV-2, "Reactivity Control System", SER dated May 26, 1981.

d. SEP Topics VI-10.A and VI-7.A.3, "Testing of Reactor Trip System and ESF's Including Response Time Testing", and "ECCS Actuation System", SER dated November 27, 1981.

e. SEP Topic VI-7.C.1, "Appendix K Electrical Instrumentation and Control Reviews", SER dated November 27, 1981, updated September 28, 1983.

f. SEP Topic VI-7.F, "Accumulator Isolation Valves Power and Control System Design", SER dated June 24, 1981.

g. SEP Topic VII-1.A, "Isolation of Reactor Protection System from Non-Safety Systems, Including Qualifiction of Isolation Devices", SER's dated December 20, 1980 and July 30, 1981.

h. SEP Topic VII-2, "Engineered Safety Features System Control Logic and Design", SER dated December 28, 1981.

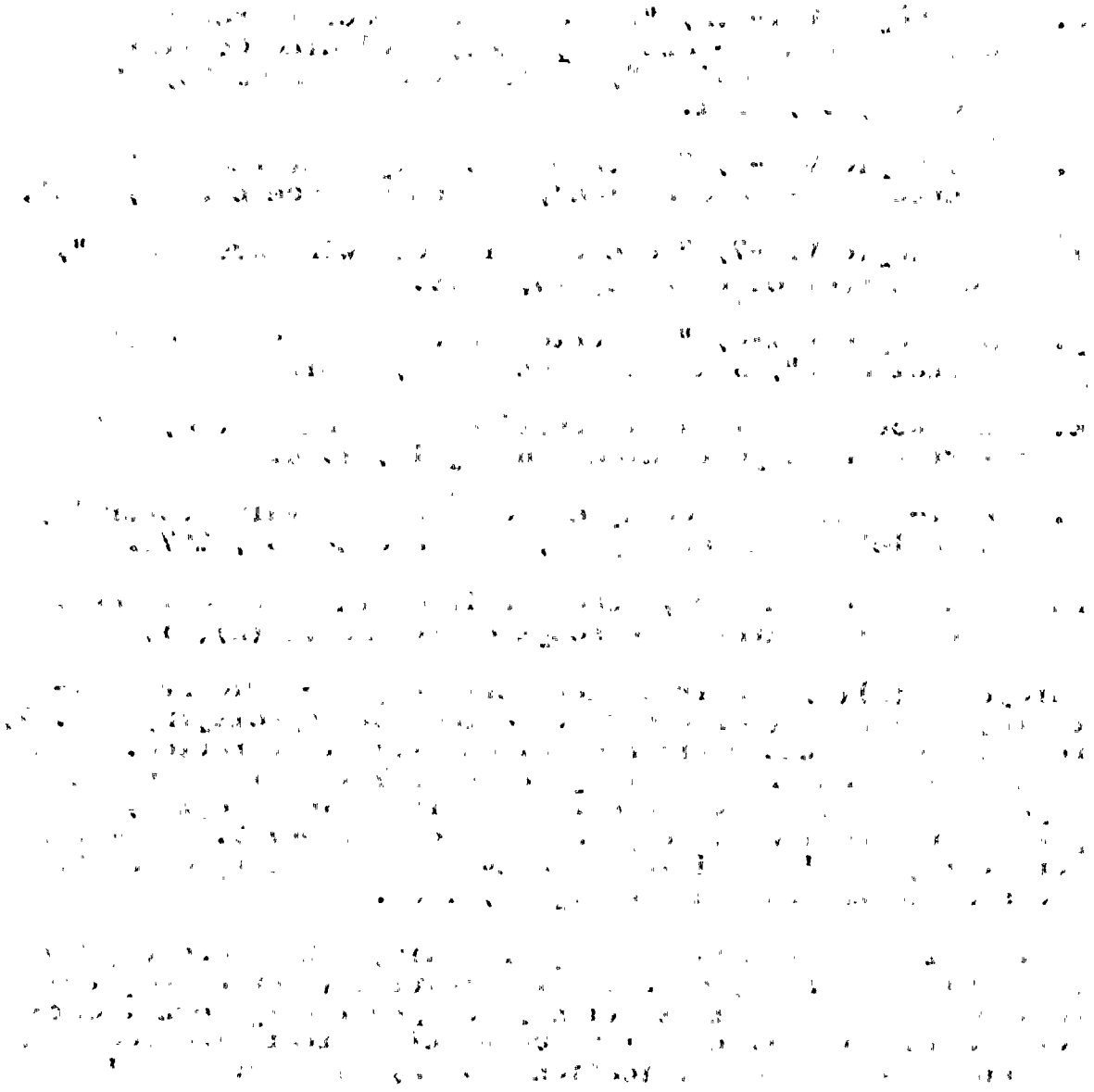
i. SEP Topic VII-7, "Acceptability of Swing Bus Design", RG&E letter of February 13, 1979.

j. SEP Topic VII-4, "Electrical Penetrations of Reactor Containment", SER dated October 8, 1981.

k. 10CFR50 Appendix R Alternative Shutdown System, RG&E letter and report dated January 16, 1984.

l. Post-accident flooding effects on ECCS Valve Controls, RG&E letters dated May 20, 1975 and May 30, 1975.

Based on these analyses, RG&E concludes that no additional equipment falls within the scope of 10CFR50.49(b)(2).

3. Paragraph (b)(3) requires that certain post-accident monitoring equipment (referenced to a footnote specifying RG1.97) be included in the environmental qualification review. The RG&E evaluation of Regulatory Guide 1.97 is being conducted separate from the Environmental Qualification Program, as part of the review of Supplement 1 to NUREG-0737. A letter concerning RG&E's position relative to Regulatory Guide 1.97 was sent to the NRC on January 31, 1984.

Post-accident monitoring equipment which RG&E presently uses to provide necessary operator information (such as required Emergency Procedure indications) has previously been incorporated into the list of instrumentation within the scope of the environmental qualification review, and meets RG&E's requirements.