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RECIP.NAME RECIPIENT AFFILIATION
PAULSON,W.A. Operating Reactors Branch 5

SUBJECT: Requests that 840720 ltr requesting extension for completion of control room habitability be considered as application to amend License DPR-18,per NUREG-0737,Item III.D.3.4.

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[illegible] extension for completion of control room habitability is considered as application to [illegible] NUREG-0737, Item III.D.3.4.

[illegible]
III : [illegible] Supp 1 to NUREG-0737 (Generic Ltr 82-33)

[illegible]

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ROGER W. KOBER
VICE PRESIDENT
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August 30, 1984

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

Subject: NUREG 0737, Item III.D.3.4
R. E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Paulson:

An NRC confirmatory order covering many NUREG 0737 topics was issued March 14, 1983 which listed Control Room Habitability to be completed during July 1984. RG&E determined this summer, largely due to circumstances beyond the company's control, that some of the equipment necessary to meet control room habitability commitments will not be operable until the end of September 1984. In a letter dated July 20, 1984, RG&E explained circumstances surrounding this delay, outlined compensatory measures to be taken until all the equipment is operational and requested that the order be modified to include the revised completion date.

Members of your staff have indicated that the requested extension is justifiable and the Company's actions have been reasonable, however, the requested extension should be in the form of a license amendment for proper processing. Therefore, kindly consider RG&E's July 20, 1984 letter to be a license amendment application or such other form as you may deem appropriate to revise the schedule.

An analysis which demonstrates that the request does not constitute a significant hazards consideration is provided in Attachment A. A check for one-hundred fifty dollars ($150) is enclosed in accordance with 10 CFR 170.72.

Very truly yours,

Roger W. Kober

Roger W. Kober

Attachment

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PDR ADOCK 05000244
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Rec'd w/check-$150.00

Redundant dampers have been installed in the control room ductwork and acceptable charcoal filter residence times have been considered in the modification of the recirculation system for the control room. New radiation and toxic gas detectors have been procured and the analyzer cabinets have been installed. However, detector operation to automatically isolate the redundant control room dampers is not yet available. In the interim period, removal of the ammonia from the old storage tank will provide a significant reduction in on-site toxic gas hazards. Manual operator action or automatic action by the existing radiation monitor will provide significant protection for postulated events. Therefore, no significant increase in the probability or consequences of an accident previously evaluated will result from the proposed order revision.

The proposed order revision, having to do only with schedules for implementation, will not create the possibility of a new or different kind of accident from any accident previously evaluated. The modifications already completed and the interim actions to be taken to reduce toxic gas hazards provide assurance that there is no significant reduction in the margin of safety.

Therefore, operation of the R. E. Ginna Nuclear Power Plant in accordance with the proposed order revision involves no significant hazards considerations.

Attachment A

In accordance with the provisions of 10 CFR 50.91, a revision to the Commission order dated March 14, 1983 and which, by NRC Staff interpretation was incorporated into Provisional Operating License DPR-18 by paragraph C of the license, has been evaluated against the criteria of 10 CFR 50.92. Specifically, the proposed revision to the order has been evaluated to determine if operation of the facility in accordance with the proposed revised order would:

(1) Involve a significant increase in the probability or consequences of an accident previously evaluated; or

(2) Create the possibility of a new or different kind of accident from any accident previously evaluated; or

(3) Involve a significant reduction in a margin of safety.

The proposed revision to the order will require that equipment necessary to meet the requirements of item III.D.3.4 of NUREG-0737 be operable by the end of September 1984 instead of July 1984. Modifications to the facility necessary to comply with item III.D.3.4, control room habitability requirements, included installation of new radiation and toxic gas monitors, installation of redundant dampers, confirmation of acceptable residence times in the charcoal filter and relocation of the ammonia tank.

A new ammonia tank designed to use dilute ammonia has been installed in a different location to reduce the potential ammonia concentration at the control building HVAC intake following a postulated tank rupture. The old tank, which contained anhydrous ammonia, has been emptied. If for any reason it becomes necessary to use the old ammonia tank at any time in the future, the following compensatory measures will be implemented to maintain the hazards at a low level. The control building air intake dampers will be closed so that potential release of ammonia will not present a hazard to the control room operators. It may be necessary during such times to periodically open the dampers for fresh air makeup for short periods of time (i.e., less than about 1 hour) in order to improve the working environment in the control room for the operators. The reason for this is that ammonia is required for about 24 hours to accomplish condensate demineralizer resin regeneration, but experience has shown that fresh air makeup to the control room is desirable every 8 to 16 hours. During the fresh air makeup, all reasonable efforts will be made to limit handling of the anydrous ammonia. In particular, any transfer between the delivery truck and the tank will be suspended.