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 PAULSON, W.A. Operating Reactors Branch 5

SUBJECT: Forwards summary of revs to "App R Alternative Shutdown
 Sys," reflecting current NRC positions & clarifying proposed
 actions by util.

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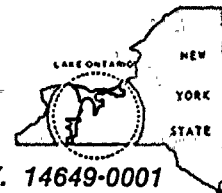
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ROGER W. KOBER
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October 4, 1984

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: Appendix R, Alternative Shutdown System
R. E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Paulson:

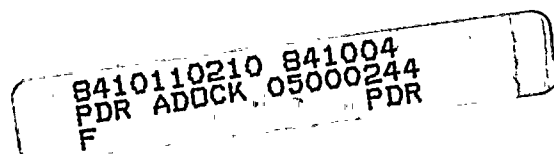
By letter dated January 16, 1984, Rochester Gas and Electric submitted a report titled, "Appendix R Alternative Shutdown System," which described RG&E proposals to provide safe cold shutdown capability following a fire anywhere in the plant as required by 10 CFR 50 Appendix R. The report described local control capability, limited upgrading of fire area boundaries, installation of protection for selected power, control and instrumentation circuits and limited exemption requests where existing plant features or proposed modifications provide a level of fire protection commensurate with the hazards in the plant.

During review of the report, NRC Staff members have requested that revisions be made to reflect current NRC positions and to clarify the actions that RG&E proposes to take. Revision 1 of the report, being submitted under separate cover, reflects the requested changes and clarifications. Because the report is lengthy and it is being reissued in its entirety, a summary of the actual changes to the report is included in Attachment A to this letter.

On May 10, 1984 the Commission issued an exemption to the schedular requirements for the alternative shutdown system as set forth in 10 CFR 50.48(c)(4). The exemption is effective until the startup from the 1986 refueling outage. RG&E has been actively working to implement the alternative shutdown system described in the report and has discussed the report with the Staff on several occasions. However, because RG&E is reluctant to continue a substantial commitment of resources without NRC approval of the proposed plans, RG&E requests that your written concurrence be provided as soon as possible. RG&E staff will be available at your convenience to assist in your review.

Very truly yours,

Roger W. Kober
Roger W. Kober



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ATTACHMENT A

The Ginna Appendix R Alternative Shutdown Report has been revised to incorporate recent Staff clarifications and address Staff questions. The changes are indicated by revision bars in the right-hand margin of the report and are outlined below.

- (1) Several fire areas were regrouped into larger fire areas. The smaller original fire areas then became fire zones of the new larger fire areas.
 - (a) Fire Area BR1A became a fire zone of Fire Area CC.
 - (b) Fire Areas IBN, IBS, ABO and N2 are all now fire zones of the new Fire Area ABI.
- (2) One new exemption request was added to address the nonrated design of the fire barrier located in Fire Zone EDGV.
- (3) The exemption request concerning one-hour and three-hour equivalent protection has been revised to refer only to one-hour equivalent protection barriers.
- (4) The exemption request concerning structural steel has been deleted.
- (5) A new exemption request concerning the barriers around the Battery Rooms was added.
- (6) A discussion of fire detector locations and new detectors to be added has been included.
- (7) Responses to NRR Staff questions were incorporated as follows:
 - (a) A discussion of two-wire ungrounded dc circuits was added to explain why a similar, previously granted exemption applies to the Ginna plant.
 - (b) A clarification was added to state that fire brigade members are not called upon for hot shutdown activities.

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- (c) Section 3 was revised to clarify the definition of activities that are considered alternative shut-down.
- (d) A clarification concerning fuse removal was added to Section 3.
- (e) Connection of spare source range electronics will be accomplished using only a procedure and is not considered repair.
- (f) Spray shields to prevent cooling of fusible links by adjacent spray heads will be incorporated at specific locations.
- (g) The NRC guidance of Generic Letter 83-33 has been incorporated for some barriers.

In addition to these revisions to the report, portions of the text were rewritten for the sake of clarity and to include editorial comments. These changes are not associated with the technical update and did not revise the meaning of the original report. The editorial revisions are not indicated by revision bars in the right hand margin.