



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555
September 17, 1982

Dr. Paul S. Shewmon, Chairman
Advisory Committee on Reactor Safeguards
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Dr. Shewmon:

In your letter to Chairman Palladino dated August 18, 1982, the ACRS presented its views on Phase II of the Systematic Evaluation Program (SEP) and the SEP review of the Ginna Plant. The purpose of this memorandum is to respond to the Committee's comments and recommendations related to the Ginna review.

Following the July 8, 1982 ACRS meeting, the staff and licensee reached agreement on the resolution on two of three issues identified in the Committee's letter.

For the issue related to groundwater level and the associated hydrostatic loads on structures below grade, the licensee has proposed to implement a continuous program for groundwater level measurement. The option of performing an evaluation of structures to demonstrate "no loss of function" due to hydrostatic pressure from a 20 ft. head of groundwater was assessed by the licensee as not being cost effective. As we discussed with the Committee, the staff was unable to conclude based upon limited independent analysis that the structures would remain functional if hydrostatic loadings were combined with other loads (e.g., seismic). If shown to be necessary based upon actual groundwater level measurements, an evaluation of hydrostatic pressure effects on structures will be performed.

For issues related to containment isolation and GDC 57, the licensee has proposed to install new manual valves for the service water penetrations to the containment fan coolers and reactor cavity coolers. The staff agrees that remote manual valves operated from the control room are not required due to low predicted radiation levels in the vicinity of these valves, adequate time for local operator action and the high costs for remotely operated valves.

The only issue for which agreement on a resolution has not been reached is related to flooding of the site by Deer Creek. The staff and licensee are in essential agreement on the magnitude of flooding (i.e., flow rates from both a Standard Project Flood and a Probable Maximum Flood), however, there is disagreement as to the flood for which the plant must be capable of safely shutting down. The staff

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agrees with the Committee's conclusion that this issue has important implications for other operating plants. The staff plans to meet with the Subcommittee on Extreme External Phenomena in October to review flooding issues at four SEP plants including Ginna.

The staff will revise draft NUREG-0821, to reflect the agreements reached between the staff and licensee and will address Deer Creek flooding in a supplemental report.

Sincerely,



Harold R. Denton, Director
Office of Nuclear Reactor Regulation

cc: SECY
OPE
OGC



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