April 28, 1983

Docket No. 50-244

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Mr. John E. Maier Vice President Electric and Steam Production Rochester Gas and Electric Corporation 89 East Avenue Rochester, New York 14649 DISTRIBUTION Docket | NRC PDR Local PDR ORB Reading NSIC DCrutchfield HSmith GDick MGrotenhuis OELD ELJordan JMTaylor ACRS (10) SEPB

Dear Mr. Maier:

SUBJECT: BLOCKING OF SAFETY INJECTION SIGNAL DURING COOLDOWN

R. E. Ginna Nuclear Power Plant

During inspection and review of PWR facilities, it was noted that some PWR facilities blocked the Safety Injection System in a manner not consistent with the Technical Specifications for that facility. We have completed a review of all PWRs and found that there is a question in this regard for your facility which is identified in the enclosure to this letter. Please respond to the concern identified within 30 days from receipt of this letter.

The reporting and/or recordkeeping requirements of this letter affect fewer than ten respondents; therefore, OMB clearance is not required under P.L. 96-511.

Sincerely,

Original signed by/

Dennis M. Crutchfield, Chief Operating Reactors Branch #5 SEOIDivision of Licensing

Enclosure: As stated

cc w/enclosure: See next page

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Mr. John E. Maier

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April 28, 1983

cc Harry H. Yoigt, Esquire LeBoeuf, Lamb, Leiby and MacRae 1333 New Hampshire Avenue, N. W. Suite 1100 Washington, D. C. 20036

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Herbert Grossman, Esq., Chairman Atomic Safety and Licensing Board U. S. Nuclear Regulatory Commission Washington, D. C. 20555

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KCLOSURE

REQUIREMENTS FOR ESF CHANNEL OPERABILITY

Technical Specifications set forth the operability requirements for engineered safety feature actuation (ESF) channels which specify actions which are to be taken when ESF channels are inoperable. For those plants which use the format of the current Standard Technical Specifications, the operability requirements are stated in terms of defined operating modes. Thus during some operating modes the operability requirements are not applicable. For older plants the operability requirements of ESF channels are determined based on the action statements imposed when the minimum operability requirements are not met. Generally, the action is identified as either hot shutdown or cold shutdown.

When an operating bypass is provided which prevents the actuation of ESF systems, the Technical Specifications indicate the conditions under which the interlock or blocking action takes place. This precludes a conflict with the operability requirements under conditions where the ESF channel is rendered inoperable due to an operating bypass. The failure to identify conditions under which safety actions are blocked by the operating bypass, is considered a violation of the operability requirements for that channel. Thus, in order to preclude such conflicts, Technical Specifications should be explicit with regards to identifying the conditions under which operating bypasses will block ESF channels.

While current Standard Technical Specifications identify operating bypasses, it has been found that some Westinghouse plants do not currently identify all operating bypasses under the operability requirements of ESF channels. This concern has been identified as multiplant action B-32. Therefore, a review was conducted of the operability requirements for ESF channels for all licensed Westinghouse plants. The channels which initiate safety injection on low pressurizer pressure always include an operating bypass to permit plant shutdown. The channels which sense steam line breaks and acutate safety injection and/or steam line isolation may or may not include a manually initiated operating bypass. In some cases the FSAR includes sufficient detail that identifies operating bypasses. In other cases, the use of the Standard . Technical Specification format.provides sufficient assurance that operating bypasses have been adequately addressed. Operating bypasses provided to block safety injection may or may not block steam line isolation where these safety actions are initiated by the same ESF channels. Since the FSAR's for many of the older plants do not address operating bypasses, this review could not confirm that the Technical Specifications relfect conditions under which ESF channels may be inoperable due to an operating bypass.

During this review, a number of errors and other problems were identified in the Technical Specifications for some plants.

The plants identified in this review should be advised that the failure to identify conditions under which safety actions are blocked by an operating bypass is considered a violation of the Technical Specification operability requirements when those channels are blocked by an operating bypass. Licensees should be required to propose changes to their Technical Specifications if these problems exist. Also, for those plants for which other problems have been noted, they should take appropriate action to resolve the concerns identified.

The following questions have been raised regarding the Ginna facility technical specifications:

- 1. Table 3.5-2 includes a column titled PERMISSABLE BYPASS CONDITIONS. The entry under this column for item la, Manual SI is, "Primary Pressure less than 2000 psig." This appears to be in error. Items lc, Steam Generator Low Steam Pressure/Loop and ld, Pressurizer Low Pressure indicated no conditions under which these safety actions may be bypassed. The table should be revised to correctly indicate those safety functions which have a manually initiated operating bypass.
- 2. Table 3.5-3 indicates no conditions under which STEAM LINE ISOLATION can be bypassed. If this is correct no changes are required.

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