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SUBJECT: Forwards response to open items noted in draft SEP Integrated Plant Safety Assessment Rept,NUREG-0821,Every effort will be made to ensure task completion within schedule.

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CRUTCHFIELD,D. Operating Reactors Branch 5

SUBJECT: Forwards response to open items noted in draft SEP Integrated Plant Safety Assessment Rept,NUREG-0821.Every effort will be made to ensure task completion within schedule.

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JOHN E. MAIER
Vice President

TELEPHONE
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August 25, 1982

Director of Nuclear Reactor Regulation
Attention: Mr. Dennis M. Crutchfield, Chief
Operating Reactors Branch No. 5
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Draft NUREG-0821
R. E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Crutchfield:

This letter responds to many of the open items noted in the draft SEP Integrated Plant Safety Assessment Report, NUREG-0821, dated May 1982. Comments on other open issues will be provided by separate letters. RG&E will attempt to respond to all open issues, either with a technical resolution or commitment schedule, by August 31, such that the information can be included in the final Integrated Plant Safety Assessment Report.

Comments on SEP topics are provided in the attachment to this letter. In addition to these comments, we would like to comment on two other aspects of NUREG-0821. In Section 1.4.1, Summary of Oak Ridge National Laboratory Report, the statement is made that, "With the exception (emphasis added) of steam generator tube leaks (5 events) and control rod malfunctions (8 events), which are discussed below, the operating experience at Ginna . . . supports the conclusion that the plant was within the original design basis." Actually, the 5 steam generator tube leaks were less than 0.1 gpm. The Ginna Technical Specifications allow continuous operation with steam generator leakage of this magnitude. Thus, the leakage experienced at Ginna was certainly within the original plant design basis. As for the control rod malfunctions, the ability to scram was not compromised in any of these events (this is even acknowledged in the IPSAR). Thus, these malfunctions were also clearly within the original design basis. We believe that this mischaracterization of events at Ginna should be rectified in the final Integrated Plant Safety Assessment.

RG&E also notes that, in the discussion of unresolved SEP issues, the report usually refers only to the NRC position, even though a summary of RG&E responses would lend perspective to the

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issues. In such cases, RG&E believes that all relevant correspondence should be addressed.

The commitment dates being provided in the attachment are those which RG&E reasonably feels can be met. Every effort will be made to ensure task completion within schedule. If circumstances intervene to prevent such timely completion, RG&E will notify the NRC promptly, and provide an updated schedule.

Very truly yours,

John E. Maier

John E. Maier

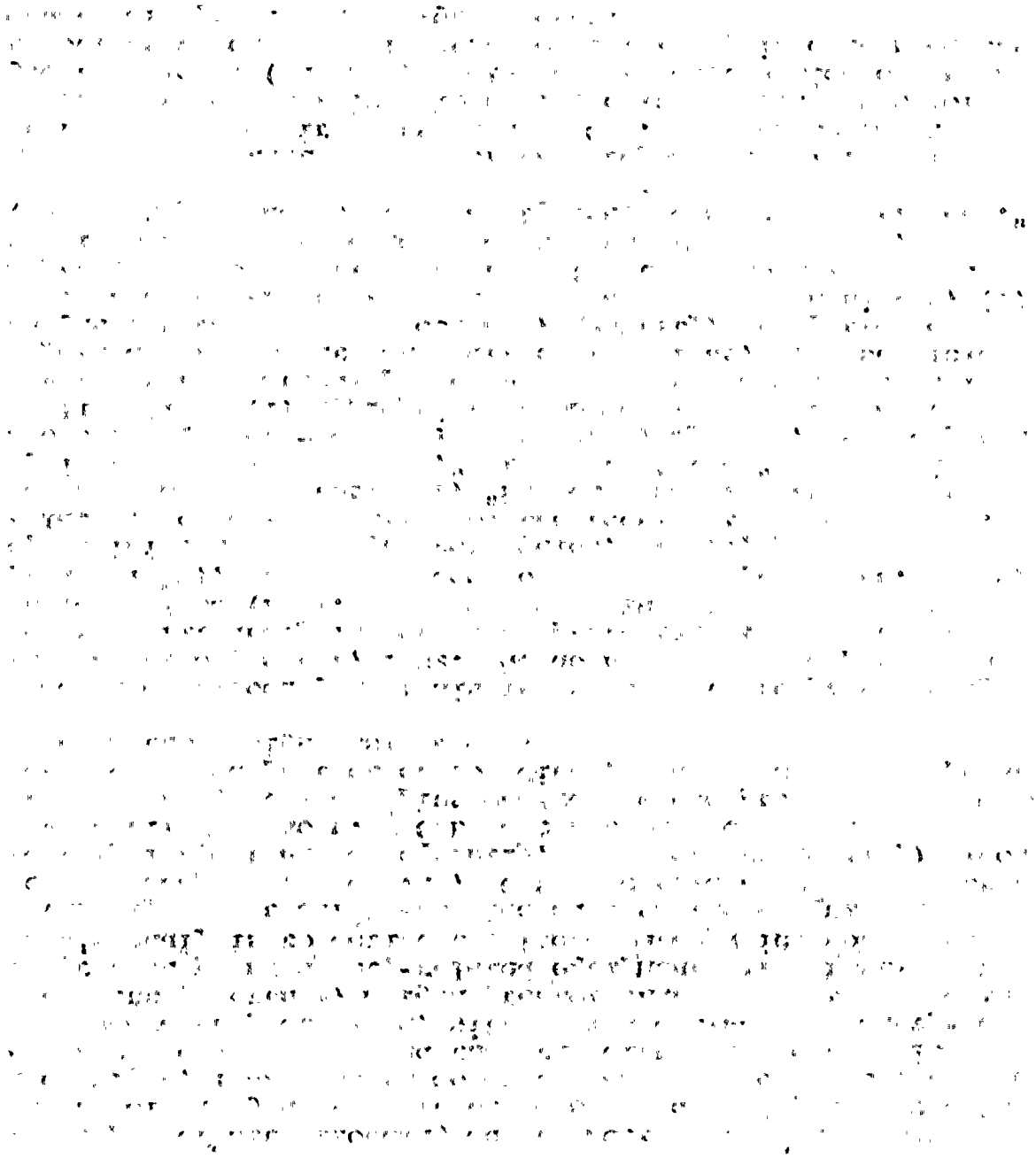
Attachment: Comments to Certain Open Issues
Detailed in NUREG-0821

1. SEP Topic II-3.C, Safety-Related Water Supply

The topic of site flooding due to Deer Creek overflowing its banks following heavy rain was discussed during the June 30 and July 8, 1982 ACRS subcommittee and full committee meetings. At that time, RG&E stated that the Ginna site could withstand a Standard Project Flood, without inundating any safety-related equipment. Further, margin greater than one foot is available to protect plant safety-related equipment. The results of RG&E's analysis to define the flood level which would not adversely affect safety-related safe shutdown equipment is not yet complete. However, RG&E is confident that protection to very large (and consequently, very low probability) flood levels will be shown. RG&E agrees that the NRC position of Standard Project Flood plus one foot would provide a reasonable level of flood protection for Ginna, and plans to incorporate such as the Design Basis Flood.

A detailed flooding analysis is expected to be provided by the end of September, 1982. We do not intend to perform a cost-benefit analysis for flood protection to the Probable Maximum Flood (PMF). The PMF is defined in a regulatory guide (1.59), not in the Code of Federal Regulations. Thus, by definition of a regulatory guide, it only provides guidance relative to implementation of the regulatory requirements. General Design Criterion 2, "Design Bases for Protection Against Natural Phenomena," states that the ". . . design bases for [safety-related] structures, systems, and components shall reflect (1) appropriate consideration of the most severe of the natural phenomena that have been historically reported for the site and surrounding areas, with sufficient margin for the limited accuracy, quantity, and period of time in which the historical data have been accumulated, (2) appropriate combinations of the effects of normal and accident conditions with the effects of the natural phenomena, and (3) the importance of the safety functions to be performed."

RG&E believes that design for the proposed SPF + 1 foot fulfills the requirements of this GDC. The cost-benefit evaluation to determine flood protection requirements for greater floods (the PMF) would require distraction of engineering resources which we feel would be better utilized in numerous other safety-related design efforts.



2. SEP Topic III-2, Wind and Tornado Loadings

In RG&E letter dated April 29, 1982, we stated that we expected the parameters for the structural upgrade to be defined eight to ten months following contractor selection. Contractor selection occurred in mid August and initial work activities have commenced. Thus, the definition of the structural design basis should be available for NRC review in April, 1983. The design and installation of any resultant physical modifications will be scheduled when the requirements are defined. Given the extent of these potential modifications, it would be inappropriate to define an unrealistically short schedule, as is presently provided in NUREG-0821.

3. SEP Topic III-3.C, Inservice Inspection of Water Control Structures

a. In paragraph 4.10.1 of NUREG-0821, it is stated that RG&E's monitoring program for the revetment must be approved by the NRC. RG&E does plan to formalize our inspection of the revetment. However, the inspection program will consist only of a knowledgeable person walking along the revetment to note anomalies. This is the same method which was used by RG&E, the NRC, and the Army Corp of Engineers to determine that the revetment is presently acceptable. Thus, RG&E does not plan to submit a "program" for the NRC to review and approve.

b. In paragraph 4.10.2 of NUREG-0821, the NRC's stated position is that Deer Creek should be added to the list of water control structures, that periodic inspections should be made, and that the wooded area be cleaned out. RG&E does not intend to establish Deer Creek as a water control structure. The site flooding analysis performed as part of Topic II-3.C will define the assumptions used for the condition of the Deer Creek channel. It is presently RG&E's intent to establish the site flood protection level consistent with the present physical condition of Deer Creek. Any effect of shrubbery and natural debris, as well as man-made obstructions such as culverts and bridges, will be accounted for in the determination of the channel capacity, and resultant plant stage levels, if applicable. Thus, we expect that there will be no need for the classification of the Deer Creek channel as a water control structure.

4. SEP Topic III-4.C, Internally Generated Missiles

In our letter dated April 27, 1982, RG&E committed to design and provide a restraint for valve operator CV5738. Section 4.12.3 of NUREG-0821 states that ". . . the licensee has committed to install a restraint on this operator by the end of the 1983 refueling outage." Actually, RG&E never committed to an installation date. We have now reviewed our work

schedules for the 1983 refueling outage, and find that, because of previously committed manpower resources for the 1983 refueling outage, this modification cannot be scheduled to be completed until the 1984 refueling outage.

5. SEP Topic III-5.A, High Energy Line Break

In Section 4.13.1 of NUREG-0821, it is stated that RG&E took credit for certain check valves on incoming lines, to prevent primary system blowdown if a pipe break should occur upstream of the check valve. Thus, RG&E should demonstrate that these check valves will fulfill their assumed isolation function by performing periodic tests.

RG&E has re-reviewed those instances where credit for check valves was taken. This occurred only in the connecting lines between the CVCS and the primary system, i.e., check valves 295 and 393 (charging), 383A (auxiliary charging), and 297 (auxiliary spray). An effects-oriented review of the piping run between the check valve and the containment penetration disclosed that no required safety-related piping would be affected from pipe whip or jet impingement effects. Only some cable trays, such as those being reviewed in relation to the CVCS letdown line, could be affected by jet impingement. These additional cable tray runs will be evaluated together with our present jet impingement study, already under way. The results of our study are expected to be completed by February 1, 1983.

In Sections 4.13.2 and 4.13.3, the NRC noted that RG&E would provide a schedule for resolution of these items. We have retained a consultant to provide the necessary analytical data in the areas of pipe whip, jet impingement, and fracture mechanics, such that hardware backfitting decisions could be made. We expect the analysis to be completed by February 1, 1983. The physical modification schedule will be provided once the requirements are defined.

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

RG&E is having a flooding and jet impingement study conducted, concerning the interaction of the essential Service Water System with steam heating lines, service water lines, and fire protection lines. As with the analysis for Topic III-5.A, the results of this study should be completed by February 1, 1983. The schedule for physical modifications will be provided once the requirements are defined.

The NRC staff position was that upgrading of the essential service water system to remove several common made failures should have a high priority, and suggested that necessary modifications should be implemented by the startup from the 1983 refueling outage. This schedule is neither realistic nor necessary. RG&E has installed backup cooling connections

for the diesel generators, and will also have connections installed in the Standby Auxiliary Feedwater System suction by January 1, 1983. This provides safety flexibility for many common made failure effects (high and moderate energy line failures, flooding of the screenhouse, and fire protection). The structural capability of the screenhouse is being pursued in concert with the overall Structural Upgrade for wind and tornado loadings at Ginna. The seismic modifications for the Service Water pumps is schedule to be completed by June 30, 1984.

7. SEP Topic III-6

RG&E expects the seismic analysis of safety-related tanks, as defined in Section 4.15.4, to be completed by the end of 1982. The schedule for hardware modifications, if required, will be provided when the requirements are defined.

The in-situ testing and subsequent analysis of the main control board cannot be performed until the Spring 1983 refueling shutdown, because of operational safety considerations. The schedule for hardware modifications, if required, will be provided when the requirements are defined.

In 4.15.6 and 4.15.7 of NUREG-0821, reference is made to SEP Owners Group programs relative to "Functionability of Safety-Related Electrical Equipment" and "Seismic Qualification of Cable Trays". We expect the generic reports to be completed by our contractors in late fall of 1982. Plant-specific submittals will be provided following the necessary review for applicability and completeness.

8. SEP Topic III-7.A, Inservice Inspection, Including Prestressed Concrete Containments with Either Grouted or Ungrouted Tendons

As noted in NUREG-0821, RG&E has agreed to implement the NRC recommendations. It should be noted that no changes to our program will be implemented until NRC review of our February 1, 1982 Containment Tendon Report is completed, and approval is received.

9. SEP Topic III-7.B, Containment Liner Insulation

RG&E expects that the final analysis, showing acceptability of the present containment liner and insulation installation, can be submitted by October 1, 1982.

10. SEP Topic V-10.A, RHR Heat Exchanger Tube Failures

During discussions between RG&E and NRC, it was noted that the present Ginna Technical Specifications already contain operability and surveillance requirements for the Radiation Monitoring System (item 18 of Table 4.1-1). Thus, this issue is resolved.

11. SEP Topic VIII-3.B, DC System Bus Voltage Monitoring and Annunciators

RG&E expects that the system to locally monitor battery and charger current, as well as a "DC trouble" alarm in the control room, will be installed during the Spring 1983 refueling outage.

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

In paragraph 4.25.2 of NUREG-0821, it is stated that RG&E planned to install another transmitter to the surge tank, with level alarms independent of the present indicator in the control room. Actually, RG&E proposes to install high and low level switches, independent of the present level indication, to alarms in the control room. These switches will be installed during the Spring 1983 refueling outage.

In paragraph 4.25.3, the NRC requires that RG&E evaluate the failure of various tanks, relative to flood protection for safety related equipment. Except for the Reactor Makeup Water tank, all this effort is being performed under SEP Topic III-6, Seismic Considerations. The Reactor Makeup Water Tank will also be evaluated for susceptibility to Tornado Generated Missiles, as part of Topic III-4.A (which in turn is being reviewed as part of the Structural Upgrade program at Ginna).

13. SEP Topic IX-6, Fire Protection

RG&E has responded to the issue of the steam generator cold shutdown method, in a letter from John E. Maier, RG&E, to Dennis M. Crutchfield, NRC, dated July 28, 1982

14. SEP Topic XV-17, Steam Generator Tube Rupture

It should be noted that Technical Specification changes on coolant activity were made, and have been implemented by Amendment 51 to the Ginna Technical Specification dated May 25, 1982.