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 RECIP. NAME: CRUTCHFIELD, D. RECIPIENT AFFILIATION: Operating Reactors Branch 5

SUBJECT: Comments on NRC assessments of SEP Topics VI-7, F, VII-3, VII-6 & VIII-2, in response to NRC 810624 ltr.

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JOHN E. MAIER
VICE PRESIDENT

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August 10, 1981

Director of Nuclear Reactor Regulation
Attention: Mr. Dennis M. Crutchfield, Chief
Operating Projects Branch #5
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555



Subject: SEP Topics VI-7.F, VII-3, VII-6, and VIII-2
R. E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Crutchfield:

This letter is in response to your letter dated June 24, 1981 regarding the referenced SEP Topic Safety Evaluations. We offer the following suggestions and comments regarding these SEP topic assessments.

VI-7.F

By letter dated August 20, 1980, we received an NRC assessment of this topic. Following review of our comments, dated January 8, 1981, the NRC issued its "Final SEP Topic Evaluation" on March 24, 1981. Your letter dated June 24, 1981 contained another assessment for topic VI-7.F, based on a contractor document, EG and G Report 1328F. Unless this contractor document is the unattributed topic assessment provided to us by your August 20, 1980 letter, we have not received it, and request a copy. In any case, we suggest that the Staff assessments include detailed references, including reference to the NRC letter which transmitted contractor reports. Only if this is done can we be assured that all documentation has been received by us.

VII-3

By NRC letter dated December 12, 1980, we received an EG and G Report 1183-4147, September 1980, entitled "Systematic Evaluation Program Review of NRC Safety Topic VII-3, Associated with the Electrical, Instrumentation and Control Portions of the Systems Required for Safe Shutdown of the Ginna Nuclear Power Plant." Our letter dated January 23, 1981 provided comments on that assessment. By NRC letter dated April 2, 1981, we received the final evaluation for topic VII-3. This final evaluation was in the form of an unattributed Technical Evaluation, dated February 27, 1981 and bearing the number "0341J." Your letter of June 24, 1981 references an EG and G Report 0314J. Our comments

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DATE August 10, 1981
TO Mr. Dennis M. Crutchfield, Chief

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under Topic VI-7.F concerning identity of the reports and referencing also apply here.

VII-6

The June 24, 1981 Staff evaluation references an Oak Ridge National Laboratory Report NUREG/CR-1464 "Review of Nuclear Power Plant Offsite Power Source Reliability and Related Recommended Changes to the NRC Rules and Regulations." We do not yet have a copy of that report and have not reviewed it to confirm its applicability to Ginna.

With respect to frequency decay, the Staff should be aware that our Application for Technical Specification change submitted on November 8, 1976 regarding under frequency trip setpoint is currently under active review by the NRC Staff. This is evidenced by NRC letter dated July 23, 1981. Our response to your letter, currently scheduled for fall of 1981, will include a detailed assessment of frequency decay rates.

VIII-2

By letter dated December 12, 1980 we received an assessment of this topic in the form of an unattributed report number 0728F dated July 7, 1980. We provided comments by letter dated January 30, 1981. By letter dated April 2, 1981, we received a "final assessment" of this topic in the form of an unattributed report number 0044J dated March 3, 1981. Our comments under Topic VI-7.F concerning identity of the reports and referencing also apply here.

Regarding the most recent assessment and its comments concerning diesel fuel oil quality, a recent Technical Specification change directly addresses the concerns raised. Amendment No. 41 dated April 23, 1981 provides detailed surveillance requirement for diesel fuel oil.

We trust these comments will be useful in preparation of any future revisions of these and other topic assessments and in performance of the Integrated Assessment.

Very truly yours,


John E. Maier

