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CRUTCHFIELD,D. Operating Reactors Branch 5

SUBJECT: Informs that schedule for performing analyses of code changes that could have decreased margins of safety will be submitted by 820531,per NRC 811230 ltr forwarding draft SER. Containment vessel evaluation encl.

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February 18, 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: SEP Topic III-7.B, "Design Codes, Design Criteria and Loading Combinations"
R. E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Crutchfield:

This letter is in response to your letter of December 30, 1981, transmitting the draft Safety Evaluation Report for this topic, as well as two contractor reports which formed the bases for the SER.

The first contractor report, Franklin Research Center draft Technical Evaluation Report TER-C5257-322, "Design Codes, Design Criteria, and Loading Combinations," identifies code changes that have occurred that could have decreased margins of safety. RG&E was requested to assess the safety margins where such code changes have been identified. This is a substantial task, requiring the review, comparison, and analysis of major sections of the ASME, AISC, and ACI Codes. We have not yet been able to assess the full scope of effort needed to perform this evaluation. It is expected that a schedule for performing the necessary analyses will be submitted to the NRC by the end of May, 1982.

The second contractor report, Structural Mechanics Associates Report SMA 12205.27R, "Combined Loads Evaluation," dated December 1981, addresses a potential containment liner plate integrity problem. The enclosed Gilbert/Commonwealth report, "Containment Vessel Evaluation," responds to the SMA report. The conclusion of the G/C report is that the structural integrity of the studs and liner would be maintained.

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It should be noted that the specific G/C analysis was performed for a post-accident pressure-temperature profile which was calculated by G/C (see Figure 3 of the report). This corresponds fairly closely to the Ginna FSAR curves and the August 1981 SMA preliminary draft report. (A February 1, 1982 RG&E letter relative to SEP Topics VI-2.D and VI-3 notes that the steam line break conditions used as the basis for the December 1981 SMA report are excessively conservative to use as a design basis). Further, the G/C report primarily evalutes this August 1981 SMA report, rather than the December 1981 report. However, the conclusion of the G/C report, provided in Sections V and VI, is that the containment liner and stud integrity would be maintained, even using these overly-conservative NRC steam break conditions.

Very truly yours,

John E. Maier