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SUBJECT: Forwards response to NRC 810112 questions re SEP Topic VI-4 re containment isolation (purge valve reset). Facility design does not allow containment isolation valves to open automatically after reset.

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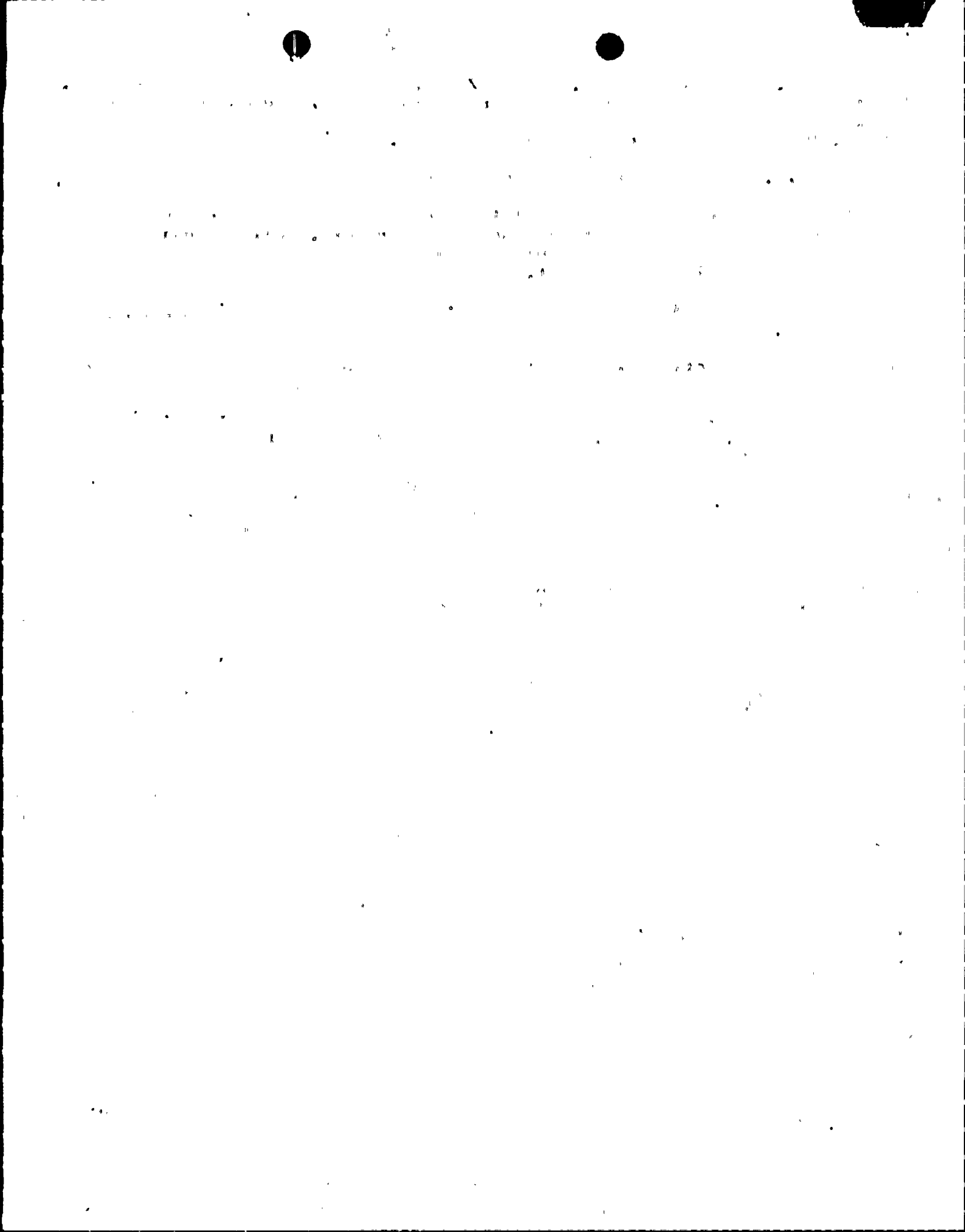
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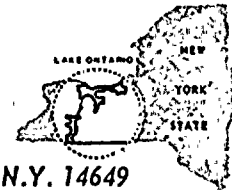
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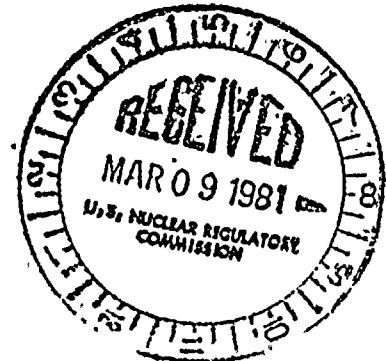


JOHN E. MAIER
VICE PRESIDENT

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March 2, 1981

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



Subject: SEP Topic VI-4, Containment Isolation (Purge Valve Reset)
R. E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Crutchfield:

This letter is in response to your January 12, 1981 letter concerning "Electrical, Instrumentation, and Control Aspects of the Override of Containment Purge Valve Isolation (Including Resolution of SEP Topic VI-4, Containment Isolation)". The enclosure provides specific responses to the NRC concerns. It is important to note, however, that the SEP evaluation by EG&G (1947F, Draft 10-10-80) is partially incorrect. The comparison to Guideline 6, on page 5 of the evaluation, states that "...operating procedures are still required at the Ginna Station to return the individual valve controllers to the closed position prior to resetting the individual valve logic". The Ginna design implemented as part of the TMI Short Term Lessons Learned modifications do not allow the containment isolation valves to open automatically after reset. The Ginna isolation valve design is thus in full conformance to Guideline 6. Details of this design were provided in the "Discussion of TMI Lessons Learned Short Term Requirements" transmitted by letter of November 19, 1979 from L. D. White, Jr. to Dennis Ziemann. NRC acceptance of this design was provided in the July 7, 1980 "Evaluation of Category "A" Lessons Learned Implementation..." Section 2.1.4, transmitted by letter from Dennis Crutchfield to L. D. White, Jr.

Very truly yours,

John E. Maier
John E. Maier

Enclosure

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Enclosure: RG&E Responses to NRC Concerns on SEP Topic VI-4,
"Containment Isolation".

- CONCERN: 1. The override capability for individual containment isolation valve be modified such that:
- a. Manual isolation is never bypassed.
 - b. Only high containment radiation or safety injection signal, but not both, are bypassed by a single operator action of a switch.

RESPONSE: Modifications to effect these guidelines have already been installed. The RG&E design complies fully with these criteria. Design details were provided in the RG&E letter dated November 19, 1979.

- CONCERN: 2. An annunciation be activated when a bypass condition is established.

RESPONSE: The Ginna design has been modified such that the containment isolation signal can no longer be bypassed at the system level. Thus, no system level annunciation is required.

- CONCERN: 3. The feedwater isolation valve control system must be modified to prevent valve motion when the isolation logic is reset or overridden.

RESPONSE: It is not clear why this requirement is necessary. In addition to shutting the main feedwater isolation valves, a Safety Injection Signal would also trip the main feedwater pumps, and close the main feedwater pump discharge valves. While reset will result in the feedwater isolation valves returning to their demand position, reset does not affect the status of the feedwater pumps or the pump discharge valve. Thus, re-opening of the feedwater isolation (and bypass) valves would not result in the addition of feedwater to the steam generation via the feedwater lines.

- CONCERN: 4. You must commit to replace the containment radiation channels that initiate containment isolation when Regulatory Guide 1.141 is approved by the NRC.

RESPONSE: This implementation of Regulatory Guide 1.141 is addressed as item II-E.4.2 of NUREG-0737. Further discussion of this issue will be via the RG&E responses to that document.

