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LEAR, G. E. Division of Boiling Water Reactor (BWR) Licensing

SUBJECT: Informs that modified emergency operating procedures containing reactor vessel level indication sys cannot be fully implemented in Mar 1987, per 870807 requirement. Implementation will be completed by Jul 1987.

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March 18, 1987

U.S. Nuclear Regulatory Commission
Document Control Desk
Attn: Mr. George E. Lear, Chief
PWR Project Directorate No. 1
Washington, D.C. 20555

Subject: Inadequate Core Cooling Instrumentation Implementation Schedule Revision - NUREG-0737, Item II.F.2
R. E. Ginna Nuclear Power Plant
Docket No. 50-244

Reference: 1. RG&E Letter from R.W. Kober to Attention of W.A. Paulson, NRR, Dated August 7, 1984
2. RG&E Letter from R.W. Kober to Attention of G.W. Lear, NRR, Dated December 22, 1986

Dear Mr. Lear:

Reference 1 provided a schedule for implementation of the Reactor Vessel Level Indication System (RVLIS) at R.E. Ginna. The schedule called for installation of RVLIS by the end of the 1986 refueling outage and implementation of modified procedures one year later with intermediate milestones between installation and implementation.

The RVLIS, as described in Reference 2, was installed in March 1986. The RVLIS is available for operator use and is noted in emergency procedures. In addition, following functional testing and calibration, preliminary setpoints were generated to provide more detailed guidance in the Emergency Operating Procedures (EOPs). During the implementation process it became apparent that the original RVLIS estimated worst case uncertainties were larger than was judged acceptable for use in detection and mitigation of degraded core cooling. Therefore, the RVLIS algorithms have been modified, major sources of channel uncertainty have been determined, and an evaluation is in progress to reduce the channel uncertainties. The objective is to improve the RVLIS accuracy so that RVLIS can better aid in the detection and mitigation of inadequate core cooling.

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The dominant source of channel uncertainty has been determined to be associated with the reactor vessel differential pressure transmitter. A detailed evaluation of transmitter errors from qualification tests and how they are applied to the RVLIS is in progress. Preliminary results indicate that the estimated RVLIS accuracy during adverse containment conditions can be improved. However, since this evaluation has not been completed, the modified EOPs containing RVLIS cannot be fully implemented in March 1987 as required by Reference 1. If the final evaluation yields acceptable results, draft EOPs containing the RVLIS setpoints will be implemented by mid June 1987 for operator training and validation and verification. Final approved EOPs will be implemented by the end of July 1987.

Currently, the RVLIS is operating and is available to the operators as additional guidance in responding to transient events. Our current EOPs note that it may be used for indication but do not require that any specific action be taken based on RVLIS. Other indicators, including core exit thermocouple temperatures, are used to assure an appropriate response to emergency conditions based on a validated non-RVLIS version of EOPs derived from the Westinghouse Owners Group Emergency Response Guidelines. Prior to revising the EOPs from the current version to include actions based on RVLIS, it is important to assure that the modified actions will improve upon the emergency response.

If the final evaluation indicates that hardware modifications are required, we will notify you by mid June 1987 and propose an implementation schedule. If hardware modifications are required, the earliest possible time for these modifications will be the spring 1988 refueling.

Very truly yours,

Roger W. Kober

Roger W. Kober