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RECIP.NAME RECIPIENT AFFILIATION
JOHNSON,A.R. Project Directorate I-3

SUBJECT: Advises that no interlocks are required for RHR valves MOV 701 & MOV 720 at plant,per NRC SER for SEP Topic V-11.B.

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April 17, 1990

TELEPHONE
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U.S. Nuclear Regulatory Commission
Document Control Desk
Attn: Allen R. Johnson
Project Directorate I-3
Washington, D.C. 20555

Subject: Lack of Interlocks on RHR Valves MOV 701 and MOV 720
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Johnson:

In the NRC's Safety Evaluation Report for SEP Topic V-11.B, "RHR Interlock Requirements", dated September 29, 1981, it was determined that the lack of interlocks on RHR MOVs 701 and MOVs 720 was acceptable. Several reasons were stated for this, as follows:

- The RHR valves are designed such that they are physically unable to open against a differential pressure greater than 500 psi
- By administrative procedure, the RHR valves are key-locked closed, with power removed
- A relief valve, set at 600 psig, is available in the RHR system.

In the course of RG&E's implementation of our MOV testing program, using the guidance of Generic Letter 89-10, it has been determined that MOVs 701 and 720 will open against a differential pressure of greater than 500 psi.

Nonetheless, RG&E considers that, with the present arrangement, no interlocks are required for these valves. In order for a potential overpressurization of the RHR system to occur, the following set of failures would have to occur: (Note: a schematic of the RHR system is shown on UFSAR Figure 5.4-7.)

1. Power would have to be deliberately restored at the breaker, in violation of procedure A-52.2
2. The key-locked switch would have to be enabled, and the valve opened, in violation of normal alignment procedures
3. The interlocked in-board valves (MOV 700 or MOV 721) would have to fail to allow significant leakage. This is considered of low probability, since these valves are in the Ginna Pump and Valve Inservice Testing Program, and are leak-tested on an annual basis using procedure PT-8.

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4. Relief valve RV-203, with a capacity of 70,000 lb/hr, would have to fail. This relief valve has been tested annually (RSSP-12) for seat leakage and setpoint verification.

Thus, it is considered that the capability of MOVs 701 and 720 to open against a differential pressure of greater than 500 psi, without the availability of interlocks on these valves, remains acceptable, and does not have a significant implication for public health and safety.

This information will be reflected in the next revision of the Ginna Station UFSAR.

Very truly yours,

Robert C. Mecredy
Division Manager
Nuclear Production

GJW\099

xc: Mr. Allen R. Johnson (Mail Stop 14D1)
Project Directorate I-3
Washington, D.C. 20555

U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

Ginna Senior Resident Inspector