UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

March 11, 1993

Docket No. 50-244

Dr. Robert C. Mecredy
Vice President, Nuclear Production
Rochester Gas & Electric Corporation
89 East Avenue
Rochester, New York 14649

Dear Dr. Mecredy:

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION (RAI) - APPLICATION FOR AMENDMENT TO OPERATING LICENSE DPR-18 - REMOVAL OF CONTAINMENT ISOLATION VALVE LIST (TABLE 3.6-1) FROM THE R.E. GINNA TECHNICAL SPECIFICATIONS (TAC NO. M77849)

Rochester Gas & Electric Corporation's (RG&E) Application for Amendment to Operating License DPR-18, dated October 15, 1990, and subsequent response to the NRC RAI, dated March 8, 1991 have been reviewed by the NRC staff. The NRC staff is currently reviewing your November 30, 1992 response to the NRC RAI, and again the NRC staff is concerned with the accuracy and completeness in transferral of the data to Table 6.2-15 (associated Figures 6.2-13 through 6.2-78) of RG&E's Updated Final Safety Analysis Report (UFSAR). In addition to responding to the discrepancies noted in the enclosed RAI, you should also verify the overall accuracy, consistency and completeness of your proposed Technical Specification (TS) amendment. The items identified in the enclosed RAI will require resolution prior to issuance of the proposed TS amendment.

Furthermore, Generic Letter 91-08 states in part, "A list of those components must be included in a plant procedure that is subject to the change control provisions for plant procedures in the Administrative Controls Section of the TS." Your Safety Evaluation does not address what TS controlled procedure covers the list of containment isolation valves.

Additionally, it was noted that the revision line is missing after item d of TS Section 3.6.3.1 where the statement concerning operability as per Appendix J leakage was previously. This should be corrected and submitted with your response to this RAI.

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The reporting and/or recordkeeping requirements contained in this letter affects fewer than ten respondents; therefore, OMB clearance is not required under P. L. 96-511.

Sincerely,

/S/

Allen R. Johnson, Project Manager
Project Directorate I-3
Division of Reactor Projects I/II
Office of Nuclear Reactor Regulation

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Sincerely,

Allen R. Johnson, Project Manager
Project Directorate I-3
Division of Reactor Projects I/II
Office of Nuclear Reactor Regulation

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Request for Additional Information

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Enclosure

REQUEST FOR ADDITIONAL INFORMATION (RAI)

BY THE OFFICE OF NUCLEAR REACTOR REGULATION

PROPOSED AMENDMENT TO TECHNICAL SPECIFICATION

REMOVAL OF CONTAINMENT ISOLATION VALVE LIST (TABLE 3.6-1)

FROM THE R.E. GINNA TECHNICAL SPECIFICATIONS

ROCHESTER GAS AND ELECTRIC CORPORATION

R. E. GINNA NUCLEAR POWER PLANT

DOCKET NO. 50-244

1. First paragraph of your Safety Evaluation, second sentence, refers to UFSAR Table 6.2.13, should this be referring to Table 6.2-15?

2. According to Generic Letter 91-08, "Removal of Component Lists from Technical Specifications (TS)," under the section entitled "Guidance on the Removal of Component Lists from TS," it states in part "... A list of those components must be included in a plant procedure that is subject to the change control provisions for plant procedure in the Administrative Controls Section of the TS.... Although some components may be listed in the Updated Final Safety Analysis Report (UFSAR), the FSAR should not be the sole means to identify these components. Licensees are only required to update the FSAR annually, and they are only required to reflect changes made 6 months before the date of filing. Thus, the FSAR may be out of date by as much as 18 months...." Your Safety Evaluation does not address what TS controlled procedure covers this list of containment isolation valves.

3. Proposed TS 3.6.3 "Containment Isolation Boundaries," items b and c state:

   "b. Isolate each affected penetration within 4 hours by use of at least one deactivated automatic valve secured in the isolation position, one closed manual valve, or a blind flange, or

   c. Verify the operability of a closed system for the affected penetrations within 4 hours and either restore the inoperable boundary to OPERABLE status or isolate the penetration as provided in 3.6.3.1.b within 30 days, or"

   The basis for this change is given as "Specification now considers closed systems as an acceptable interim passive boundary and is more consistent with Standard Technical Specifications." However, this does not reflect the Standard Technical Specification (STS) requirement. STS 3.6.3.C states:

"Isolate the affected penetration flow path by use of at least one closed and de-activated automatic valve, closed manual valve, or blind flange. (4-hour completion time)

AND

Verify the affected penetration flow path is isolated (once per 31 days)"

Therefore, the proposed change to TS 3.6.3.C is not acceptable.

4. The term "Isolation Valve" is used in the proposed Bases Section of 4.4 (page 4.4.-14), according to the SE, should have been replaced with the term "Isolation Boundary."

5. Proposed TS 3.6.1.a states, "Closed valves may be opened on an intermittent basis under administrative control." Generic Letter 91-08 and your safety evaluation refer to "Locked or Sealed Closed containment isolation valves" not just "Closed valves." Should proposed TS 3.6.1.a be referring to locked or seal closed CIVs?

6. Comments with regard to R.E. Ginna Updated Final Safety Analysis Report (UFSAR) Table 6.2-15 and Figures 6.2-13 through 6.2-78 are contained on the following pages.

Identified discrepancies associated with proposed UFSAR Table 6.2-15

	Pentration	Valve/Boundary	Discrepancy
1.	105	2829	Position indication in control room is marked "NA" for a manually operated valve. Should this be "No" for consistency?
2.	105	859A	Valve does not appear on the UFSAR Figure 6.2-18, as indicated by proposed UFSAR Table 6.2-15.
3.	105	859B	Valve does not appear on the UFSAR Figure 6.2-18, as indicated by proposed UFSAR Table 6.2-15.
4.	105	864A	The normal operations position of the valve is listed as "C" (closed) in proposed UFSAR Table 6.2-15 however, it is indicated as "LC" (locked closed) on UFSAR Figure 6.2-18.

	Pentration	Valve/Boundary	Discrepancy
5.	109	859A	Valve does not appear on the UFSAR Figure 6.2-22, as indicated by proposed UFSAR Table 6.2-15.
6.	109	859B	Valve does not appear on the UFSAR Figure 6.2-22, as indicated by proposed UFSAR Table 6.2-15.
7.	109	864B	The normal operations position of the valve is listed as "C" (closed) in proposed UFSAR Table 6.2-15 however, it is indicated as "LC" (locked closed) on UFSAR Figure 6.2-22.
8.	112	200A	The valve type is listed as a "Globe" valve in proposed UFSAR Table 6.2-15 however, it is indicated as a "Gate" valve on UFSAR Figure 6.2-25. Also, proposed UFSAR Table 6.2-15 indicates that this valve trips on CIS, however, this is not noted with a "T" on UFSAR Figure 6.2-25.
9.	112	200B	The valve type is listed as a "Globe" valve in proposed UFSAR Table 6.2-15 however, it is indicated as a "Gate" valve on UFSAR Figure 6.2-25. Also, proposed UFSAR Table 6.2-15 indicates that this valve trips on CIS, however, this is not noted with a "T" on UFSAR Figure 6.2-25.
10.	112	202	The valve type is listed as a "Globe" valve in proposed UFSAR Table 6.2-15 however, it is indicated as a "Gate" valve on UFSAR Figure 6.2-25. Also, proposed UFSAR Table 6.2-15 indicates that this valve trips on CIS, however, this is not noted with a "T" on UFSAR Figure 6.2-25.

	Pentration	Valve/Boundary	Discrepancy
11.	112	371	The valve type is listed as a "Globe" valve in proposed UFSAR Table 6.2-15 however, it is indicated as a "Gate" valve on UFSAR Figure 6.2-25.
12.	112	820	This valve is indicated in UFSAR Figure 6.2-25, and in the current Technical Specifications as a CIV, however, it is not indicated in proposed UFSAR Table 6.2-15.
13.	112	204A	This valve is indicated in UFSAR Figure 6.2-25, and in the current Technical Specifications as a CIV, however, it is not indicated in proposed UFSAR Table 6.2-15.
14.	123b	9725	The normal operations position of the valve is listed as "C" (closed) in proposed UFSAR Table 6.2-15 however, it is indicated as "LC" (locked closed) in UFSAR Figure 6.2-26.
15.	127	749A	The maximum isolation time as listed in proposed UFSAR Table 6.2-15 is "NA", however, it is listed in the current Technical Specifications as having a maximum isolation time of 60 seconds.
16.	128	749B	The maximum isolation time as listed in proposed UFSAR Table 6.2-15 is "NA", however, it is listed in the current Technical Specifications as having a maximum isolation time of 60 seconds.
17.	143	1721	Proposed UFSAR Table 6.2-15 indicates that this valve trips on CIS, however, this is not noted with a "T" on UFSAR Figure 6.2-45.

	Pentration	Valve/Boundary	Discrepancy
18.	201a	NA	The system is listed in proposed UFSAR Table 6.2-15 as "Reactor compartment cooling unit A" and should be listed as "Reactor compartment cooling unit A supply," for consistency.
19.	201b	PI-2141	This instrument is still not indicated in UFSAR Figure 6.2-46 as a CIB, even though you stated in your response to the September 26, 1991, RAI that this item was corrected.
20.	206b	5733	This valve is indicated in UFSAR Figure 6.2-54, and in the current Technical Specifications as a CIV, however, it is not indicated in proposed UFSAR Table 6.2-15.
21.	207b	5734	This valve is indicated in UFSAR Figure 6.2-56, and in the current Technical Specifications as a CIV, however, it is not indicated in proposed UFSAR Table 6.2-15.
22.	207b	5736	The valve type is listed as a "Globe" valve in proposed UFSAR Table 6.2-15 however, it is indicated as a "Gate" valve in UFSAR Figure 6.2-56.
23.	209a	NA	The system is listed as "Reactor compartment cooling unit B return" and according to UFSAR Figure 6.2.47 it should be listed as "Reactor compartment cooling unit B supply."
24.	209a	PI-2140	This instrument is indicated on UFSAR Figure 6.2-46 as a CIB, however, it is not indicated in proposed UFSAR Table 6.2-15.
25.	209b	NA	The system is listed as "Reactor compartment cooling unit A supply" and according to UFSAR Figure 6.2.46 it should be listed as "Reactor compartment cooling unit B return."

	Pentration	Valve/Boundary	Discrepancy
26.	210	10214s	Note 15 is listed in the proposed UFSAR Table 6.2-15 as applicable. However, note 17 appears to be more appropriate. In addition, note 17 would make it consistent with valve 10215s.
27.	300	5879	This valve is listed in proposed FSAR Table 6.2-15, and in the current Technical Specification as a CIV, however, it is not indicated as a CIV on UFSAR Figure 6.2-58.
28.	305a	1556	The maximum isolation time as listed in proposed UFSAR Table 6.2-15 is "NA", however, it is listed in the current Technical Specifications as having a maximum isolation time of 60 seconds.
29.	307	9227	The maximum isolation time as listed in proposed UFSAR Table 6.2-15 is 60 seconds, however, the current Technical Specifications has the maximum isolation time listed as "note 18".
30.	308	TIA-2010	This instrument is still not indicated in UFSAR Figure 6.2-65 as a CIB, even though you stated in your response to the September 26, 1991, RAI that this item was corrected.
31.	308	NA	This penetration was indicated as pentration 319 on the current Technical Specifications.
32.	311	TIA-2011	This instrument is still not indicated in UFSAR Figure 6.2-65 as a CIB, even though you stated in your response to the September 26, 1991, RAI that this item was corrected.
33.	313	Blind Flange	The Blind Flange is indicated in UFSAR Figure 6.2-69 as "CIV," should this be "CIB."

	Pentration	Valve/Boundary	Discrepancy
34.	315	TIA-2012	This instrument is still not indicated in UFSAR Figure 6.2-65 as a CIB, even though you stated in your response to the September 26, 1991, RAI that this item was corrected.
35.	317	Blind Flange	The Blind Flange is indicated in UFSAR Figure 6.2-70 as "CIV," should this be "CIB."
36.	319	NA	This penetration was indicated as penetration 308 on the current Technical Specifications.
37.	320	4641	This valve was indicated as 4647 in the current Technical Specification.
38.	321	5701	This valve is indicated on UFSAR Figure 6.2-71, and in the current Technical Specifications as a CIV, however, it is not indicated in proposed UFSAR Table 6.2-15.
39.	322	5702	This valve is indicated on UFSAR Figure 6.2-72, and in the current Technical Specifications as a CIV, however, it is not indicated in proposed UFSAR Table 6.2-15.
40.	323	TIA-2013	This instrument is still not indicated on UFSAR Figure 6.2-65 as a CIB, even though you stated in your response to the September 26, 1991, RAI that this item was corrected.
41.	332a	922	The valve type is listed as a "Gate" valve in proposed UFSAR Table 6.2-15 however, it is indicated as a "Globe" valve in UFSAR Figure 6.2-74. Also proposed UFSAR Table 6.2-15 indicates that this valve's normal operating position is "C" (closed), however, it is indicated as open in UFSAR Figure 6.2-74. In addition, the maximum isolation time as listed in proposed UFSAR Table 6.2-15 is 3 seconds, however, the

	Pentration	Valve/Boundary	Discrepancy
			current Technical Specifications has the maximum isolation time listed as "NA."
42.	332a	924	The valve type is listed as a "Gate" valve in proposed UFSAR Table 6.2-15 however, it is indicated as a "Globe" valve in UFSAR Figure 6.2-74. Also proposed UFSAR Table 6.2-15 indicates that this valve's normal operating position is "C" (closed), however, it is indicated as open on UFSAR Figure 6.2-74. In addition, the maximum isolation time as listed in proposed UFSAR Table 6.2-15 is 3 seconds, however, the current Technical Specifications has the maximum isolation time listed as "NA."
43.	332b	923	The valve type is listed as a "Gate" valve in proposed UFSAR Table 6.2-15 however, it is indicated as a "Globe" valve in UFSAR Figure 6.2-74. Also proposed UFSAR Table 6.2-15 indicates that this valve's normal operating position is "C" (closed), however, it is indicated as open in UFSAR Figure 6.2-74. In addition, the maximum isolation time as listed in proposed UFSAR Table 6.2-15 is 3 seconds, however, the current Technical Specifications has the maximum isolation time listed as "NA."
44.	332d	921	The valve type is listed as a "Gate" valve in proposed UFSAR Table 6.2-15 however, it is indicated as a "Globe" valve in UFSAR Figure 6.2-74. Also proposed UFSAR Table 6.2-15 indicates that this valve's normal operating position is "C" (closed), however, it is indicated as open in UFSAR Figure 6.2-74. In addition, the maximum isolation time as listed in proposed UFSAR Table 6.2-15 is 3 seconds, however, the

	Pentration	Valve/Boundary	Discrepancy
			current Technical Specifications has the maximum isolation time listed as "NA."
45.	401	3521	The valve type is listed as a "Gate" valve in proposed UFSAR Table 6.2-15 however, it is indicated as a "Globe" valve in UFSAR Figure 6.2-76.
46.	401	PT-469A	Instrument is indicated as Inside Containment in proposed UFSAR Table 6.2-15, however, it is indicated as outside containment in UFSAR Figure 6.2-76.
47.	402	3520	The valve type is listed as a "Gate" valve in proposed UFSAR Table 6.2-15 however, it is indicated as a "Globe" valve in UFSAR Figure 6.2-76.
48.	403	3995X	The valve type is listed as a "Globe" valve in proposed UFSAR Table 6.2-15 however, it is indicated as a "Gate" valve in UFSAR Figure 6.2-78.
49.	403	4011A	The valve type is listed as a "Globe" valve in proposed UFSAR Table 6.2-15 however, it is indicated as a "Gate" valve in UFSAR Figure 6.2-78.
50.	404	3994E	The valve type is listed as a "Globe" valve in proposed UFSAR Table 6.2-15 however, it is indicated as a "Gate" valve in UFSAR Figure 6.2-78.
51.	404	4012A	The valve type is listed as a "Globe" valve in proposed UFSAR Table 6.2-15 however, it is indicated as a "Gate" valve in UFSAR Figure 6.2-78.

Location		Discrepancy
52.	Note 17	If this note describes valves that are not CIVs, then to avoid confusion, the note should state that these valves are not CIVs.
53.	Figure 6.2-13	There is no indication on the figure of where the "CIB" is for either penetration 2 or 29.
54.	Figure 6.2-65	The "CIB" Cap downstream of 12500H/1200K doesn't show up on the proposed UFSAR Table 6.2-15 for either penetration 320 or 312. The figure does not indicate the association between penetrations and containment fan coolers.
55.	Figure 6.2-76	"CIV" appears on the figure (above CIV 11031 and to the left of valve 3409A) but it does not appear to be associated with any particular valve.
56.		There is a lack of consistency for UFSAR Figures 6.2-13 through 6.2-78, with respect to the symbols used to represent the direction of flow through check valves, and the symbols used to represent air operated valves. In addition, not all figures indicate "CLIC" or "Closed System" where it is applicable.