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 AUTH. NAME    AUTHORITY AFFILIATION  
 MECREY, R.C.    Rochester Gas & Electric Corp.  
 RECIP. NAME    RECIPIENT AFFILIATION  
 JOHNSON, A.R.    Project Directorate I-3

SUBJECT: Informs that util in process of procuring replacement SGs for plant, in ref to NRC, 7590-01, "10CFR50 Mod of GDC-4 Requirements for Protection Against Dynamic Effects of Postulated Pipe Ruptures" & GL 84-04.

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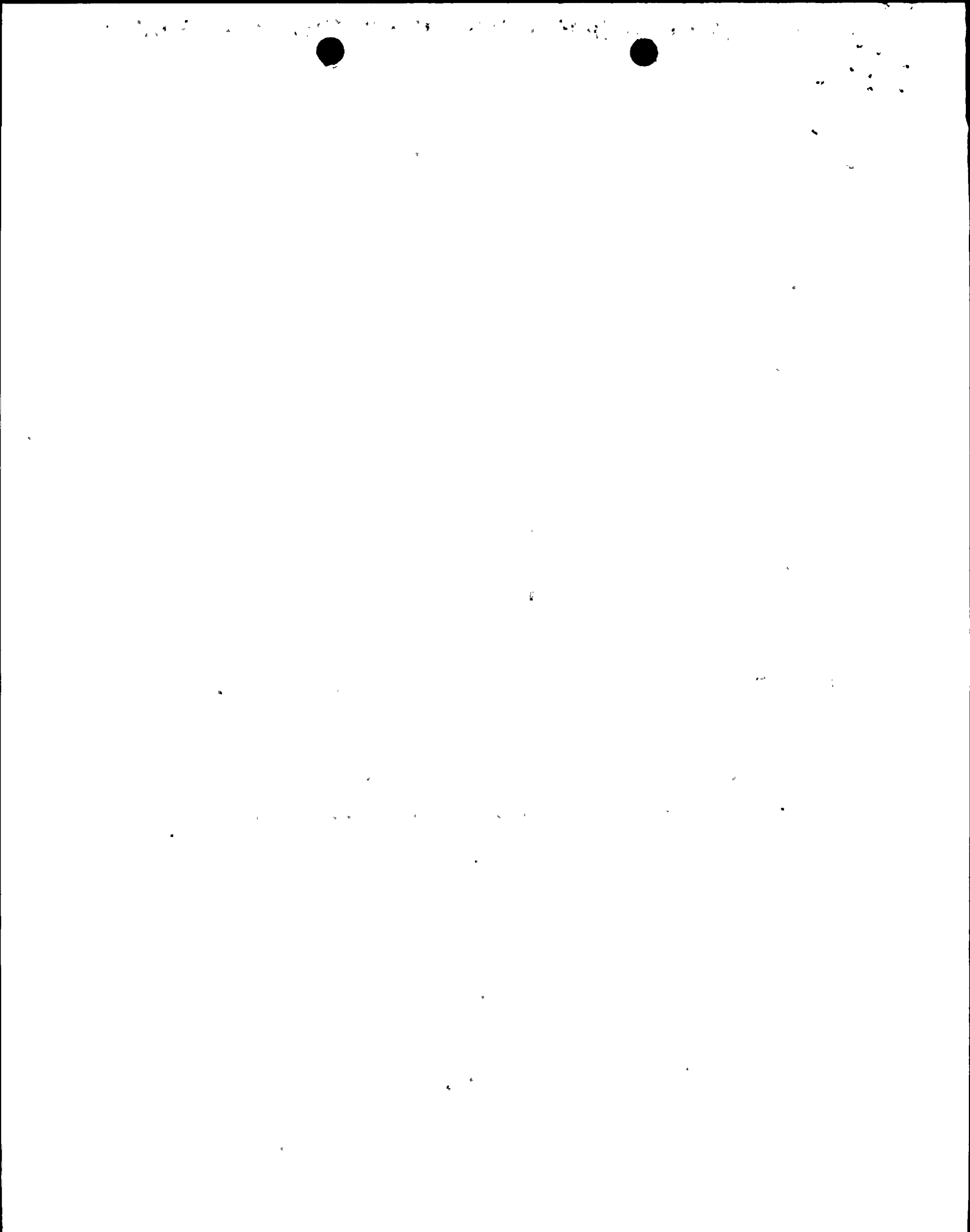
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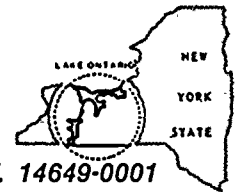
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May 13, 1993

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

Subject: Application of Leak Before Break Technology, GDC-4  
R.E. Ginna Nuclear Power Plant  
Docket No. 50-244

Ref. (a): Nuclear Regulatory Commission, 7590-01, "10CFR50  
Modification of General Design Criteria 4 Requirements  
for Protection Against Dynamic Effects of Postulated Pipe  
Ruptures," Statement of Considerations.

(b): NRC Letter, D. C. DiIanni to R. W. Kober (RG&E), "Docket  
No. 50-244, (Generic Letter 84-04)", dated September 9,  
1986.

Dear Mr. Johnson:

Rochester Gas and Electric is in the process of procuring replacement Steam Generators for the R. E. Ginna Nuclear Power Plant. The process of establishing the design specification for these generators has led us to conclude that it is desirable to clarify the design basis of the R. E. Ginna Nuclear Power Plant regarding the dynamic effects of primary system pipe ruptures.

In Reference (a) the NRC indicates that if it can be demonstrated that the probability of pipe rupture is extremely low, the dynamic effects of the pipe rupture, i.e. missile generation, pipe whipping, pipe break reaction forces, jet impingement forces, decompression waves within the ruptured pipe and dynamic or non-static pressurization in cavities, subcompartments and compartments, can be excluded from the design basis of the unit. The statement of considerations specifically excludes the applicability of this rulemaking to emergency core cooling systems, containments, and environmental qualification. By reference b, the NRC approved the use of this rulemaking for primary system piping for the R. E. Ginna Nuclear Power Plant.

While the rulemaking (Reference (a)) explicitly discusses piping supports, it does not discuss internals of reactor coolant system components. It is our interpretation that the rulemaking is applicable to internal components, as long as the functionality of

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the Emergency Core Cooling System or Containment are not adversely affected by the component.

It is our intention that the design basis for internal, non-pressure boundary components of the steam generator, specifically the primary side divider plate, reflect this rulemaking. Therefore the dynamic effects of primary system piping ruptures need not be included in the design basis of this plate. This is consistent with the conversations of May 7 and 10, 1993 between Mr. George Wrobel (RG&E) and Mr. James Norberg and Mr. Jay Rajan of the NRC.

Very truly yours,

  
Robert C. Mecredy

BJF\284  
Attachment

xc: Mr. Allen R. Johnson (Mail Stop 14D1)  
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Washington, D.C. 20555

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Ginna Senior Resident Inspector