Enclosure 1

3

#### NOTICE OF VIOLATION

Rochester Gas & Electric Corporation R. E. Ginna Nuclear Power Plant Docket No. 50-244 License No. DPR-18

During an NRC inspection conducted on various dates in April and May 1993 that concluded on June 18, 1993, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below:

10 CFR 50, Appendix B, Criterion XVI, Corrective Action, states in part that "Measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected."

Contrary to the above, in April 1992 after a second service water valve failure of a non safety-related Crane Company model 101 XU valve due to stem to disc separation by corrosion, adequate corrective actions were not taken to identify degradation or the impact of similar failures of safety-related valves in that on March 28, 1993, the licensee identified locked open safety-related manual valves 4669 and 4738 in failed closed position with stems to discs separated.

This is a Severity Level IV violation (Supplement I).

Pursuant to the provisions of 10 CFR 2.201, Rochester Gas & Electric Corporation is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region I, and a copy to the NRC Resident Inspector, within 30 days of the date of the letter transmitting this Notice. This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for the disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the licensee should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.



OFFICIAL RECORD COPY A:GINENF.HG



#### Persons in Attendance at the July 16, 1993 Enforcement Conference

#### **Rochester Gas and Electric Corporation**

R. Marchionda, Superintendent, Production

T. Marlow, Department Manager, Quality Performance

R. Mecredy, Vice President, Ginna Nuclear Production

T. Newberry, Lead Mechanical Engineer

L. Sucheski, Structural Engineer

O(

- J. Widay, Plant Manager, Ginna
- G. Wrobel, Manager, Nuclear Safety and Licensing

New York State Public Service Commission

K. Roenick, Nuclear Engineer

US Nuclear Regulatory Commission

W. Butler, Project Director, PD 1-3, NRR
J. Carrasco, Reactor Engineer, Region I
P. K. Eapen, Section Chief, Systems Section, Region I
H. Gregg, Senior Reactor Engineer, Region I
W. Hodges, Director, Division of Reactor Safety
D. Holody, Enforcement Officer, Region I
W. Lazarus, Section Chief, RPS-3B, DRP, Region I
J. Luehman, Senior Enforcement Specialist, OE
T. Moslak, Senior Resident Inspector, Ginna, Region I
D. Screnci, Field Public Affairs Officer, Region I
J. Tatum, Senior Reactor Engineer, NRR

## GINNA STATION

## ENFORCEMENT CONFERENCE

## SERVICE WATER SYSTEM

Inspection Report 93-08

July 16, 1993



## <u>AGENDA</u>

Introduction R. C. Mecredy Background Information T. A. Marlow Actions in Response to Earlier T. A. Marlow Valve Failures Actions During 1993 Refueling R. A. Marchionda Outage Future Actions R. A. Marchionda Safety Implications G. J. Wrobel Plant Management Perspectives J. A. Widay R. C. Mecredy Conclusions T. E. Newberry Underground Piping Activities R. C. Mecredy Conclusions

## SERVICE WATER SYSTEM (SWS)

## NRC ENFORCEMENT CONFERENCE

JULY 16, 1993

Introduction

 $0 \parallel$ 

ð

- Ginna SWS Design
- Ginna Reliability Centered Maintenance (RCM)
   Project Related to SWS Program
- Ginna RCM Project Related to Valve Improvement Project (VIP)
- Status VIP Scope through 1992
- 101XU Failure Discovery
- 101XU Failure Evaluation
- Comprehensive SWS 1993 Outage Preparation
- Conclusion

## GINNA SERVICE WATER SYSTEM (SWS) DESIGN

- SWS Suction From Lake Ontario
- SWS Loops are Cross-Tied
- SWS Supplies Essential and Non-Essential Users
- SWS Isolates Non-Essential Users on SI and UV
- SWS is Normal Supply to Standby Auxiliary Feedwater System
- SWS is Alternate Supply to the Auxiliary Feedwater (AFW) System
- SWS Provides Cooling to Critical Loads During Accident Conditions
  - Spent Fuel Pit Heat Exchangers
  - Component Cooling Heat Exchangers
  - Emergency Diesel Generators
  - Containment Recirculation Fan Coolers
  - Safety Injection Pump Thrust Bearings
- Review Flowpath on Modified P&ID

enfconf:2

**VIA** 



• • •

l) Ž

4

<sup>9)</sup>r enfconf:3

GINNA RCM PROJECT (Related to VIP)

## FLOW CHART

## SYSTEM SELECTION CRITERIA

## SYSTEM RANKING

SUMS

SERVICE WATER SYSTEM EFFORTS

enfconf:4

. 18,8



enfconf:5

3

-

## RCM SYSTEM RANKING WITH RESPECT TO ATTRIBUTES

	1	2	3	4	5	6
Rankings	Reactor Safety	Regulatory Concerns	Public Safety	Human Factors	Potential for Improvement	Combined
1.	SIS	D/G	RCS	TRB Gen	sw	SIS
2.	ESFA	RCS	S/G	MFW	MFW	ESFA
3.	RCS	ESFA	CNMT	ESFA	Water Treatment	S/G
4.	D/G	AFW	ESFA	S/G	Air	RCS
5.	AFW ·	CNMT	D/G	RCS	Waste Liquid	D/G
6.	Elect DC	S/G	SIS	D/G	Incore Ins.	AFW
7.	RPS	SIS	RHR	RPS	RPS	RPS
8.	RHR	RPS	RPS	Fire Protection	Elect DC	Elect DC
9.	SW	RHR	CRD	SIS	Heat Steam	RHR
10.	CNMT	Elect DC	Fire Protection	AFW	TRB Gen	sw
11.	CNMT Spray	CRD	AFW	Main Steam	HVAC	CNMT
12.	S/G	Elect AC	Elect DC	RHR	Extr. Steam	CNMT Spray

2

enfconf:6

 $a_{11}$ 

## RCM SUMS SYSTEM SELECTION

- Auxiliary Feedwater System
- Safety Injection System
- Residual Heat Removal System
- Diesel Generator
- Service Water System

1987	1988	1989	1990	1991	1992	1993	1994	1995	ŝ
Ι	[ ]		[	I .	I .	ľ	Ι	I	 2

[ RCM History Reviews ]

I 1989 AI&O CCW Heat Exchanger, SFP Heat Exchanger Eddy Current Inspection

I (6/89) SW Project Planning (SW Operability, MOVs, Bolting)

I (7/89) GL 89-13

I (4/90) SW Hx Fouling Inspection

I (5/90) First 101XU Failure (NSR) - Valve V-4675

I (9/90) Attend EPRI Seminar on Service Water Reliability Improvements

I (1/91) SW RCM Analysis Complete

I (5/91) SW Valve Refurbishment/replacement Scope (101XUs)

[ 5/91 - SW Valve Planning/Scheduling ]

I (8/91) SWSROP Complete

I (12/91) NRC SW Inspection

I (4/92) Second 101XU Failure (NSR) - Valve V-4690

I (4/93) SW Valve & Comp. Insp - Phase 5

I SW Valve & Comp Insp - Phase 6

GINNA VALVE INSPECTION PROGRAM

SCOPE

## **OBJECTIVES**

## DETAILS

## IMPLEMENTATION STATUS

enfconf:9

**(**8

#### TYPICAL GINNA OUTAGE VALVE/ACTUATOR PROGRAM

#### Defined Scope

431

- Prioritized Manual Valves (Checks, Gates, Globe)
- Disassembly
  - Inspection
    - Refurbishment
- MOV Actuators
  - Disassembly
    - Inspection
      - Refurbishment
        - Diagnostic Testing

#### **Objectives**

- Continued Documentary on Actual Conditions of Valves
- Upgrade based on Vendor Improvements
- Upgraded Based on Industry Operating Experience

#### <u>Details</u>

- Root Cause Analysis for Major Defects
- New Plant Procedures
- Spare Parts Planning
- Results Incorporated into RCM Living Program

#### Implementation Status (Next Slide)

enfconf:10

VALVE INSPECTION/REFURBISHMENT PROGRAM

YEARS	SCOPE	SYSTEMS
1989	<ul><li>34 Valves</li><li>21 MOV Actuators</li><li>31 MOV MOVATS Diagnostic</li></ul>	RCS, RHR, SI
1990	<ul><li>39 Valves</li><li>24 MOV Actuators</li><li>28 MOV MOVATS Diagnostic</li></ul>	AFW, CCW, CS, CVCS, SI, RHR
1991	69 Valves 23 MOV Actuators 29 MOV MOVATS Diagnostic	SI, AFW, SBAFW, MFW, CW, SW (4 Act., 2 Vlvs)
1992	40 Valves 11 MOV Actuators 15 MOV MOVATS Diagnostic	AFW, CW, MFW, SI, SBAFW, SW (4 Act., 2 Vlvs)

enfconf:11

#### 101XU FAILURE PRESENTATION

#### Discovery

(**)** 

■ 101XU Failure Discovery

#### Assessment

- Applicability of Failure as Generic Concern Known at RG&E
- No Additional Industry Failure Data Available

#### **Evaluation**

- Generic Assessment on Safeguards Equipment
  - Emergency Diesel Generators
  - Auxiliary Feedwater System
  - Safety Injection System

#### Feedback

- 1992 Outage Feedback
- Motivation Focused on Comprehensive SWS Corrective Action

#### Program

- **Review 1993 Service Water Outage Preparations & Logistics**
- Conclusion

enfconf:12

## 101XU FAILURE PRESENTATION DISCOVERY

<u>May 1990</u>

,

- First Failure Valve V-4675
  - Valve V-4675 Inlet to Turbine Generator Seal Oil Heat Exchanger

## Failure Detected

• Valve V-4675 Closed for Maintenance

## Valve Material Condition

- Post-Maintenance Restoration
- Valve V-4675 Inspection
- Temporary Repair Performed

enfconf:13



CRANE, GATE VALVE, MODEL NO. 101-XU

¥

## 101XU FAILURE PRESENTATION DISCOVERY

## April 1991

÷,

- Second Failure Assumed Valve V-4690
  - Valve V-4690 Inlet to Turbine Lube Oil Cooler "B"

### Failure Detected

- Valve V-4690 Close to Provide for Eddy Current Inspection
- Valve V-4690 Realigned for Service
- "B" Lube Oil Cooler MCB Alarm
- Safety Evaluation Performed (Undocumented)

#### 101XU FAILURE PRESENTATION ASSESSMENT

#### <u>May 1991</u>

 $\mathbf{b}$ 

- Research Generic Application of 101XU With Respect To Safety Related Service Water System
- Plant Superintendent Letter (5/22/91)
  - Scope
    - EWR-5098
    - Bolting
    - Replacement Valves
  - Strategy
    - Isolation of Service Water System
    - Coordination of Service Water Projects
    - Procurement
    - Milestone Schedule

## Valves Selected for Refurbishment/Replacement

SWS Component	Size	Model
V-4669	4" <sup>`</sup>	101XU
V-4760	4"	101XU
V-4612 <sup>-</sup>	4"	101XU
V-4611	4"	101XU
V-4621	6"	101XU
V-4738	3"	101XU
V-4739	3"	101XU

## 101XU FAILURE PRESENTATION ASSESSMENT

## June 1991

0

• )

- June 13, 1991 Plant Service Water System Project Manager Meeting Minutes
- EWR-5098 To Replace Additional Valves

## Valves Selected for Refurbishment/Replacement

SWS Component	Size	Model
V-4738	3"	101XU
V-4739	3"	101XU
V-4675	3"	101XU

## 101XU FAILURE PRESENTATION Emergency Diesel Generators Evaluation April 1991

Detectability of Functional Failure

(3

- Twice Per Shift Operator Logs of SW Pressure
  - Jacket Water Heat Exchanger
  - Lube Oil Heat Exchanger
- Monthly PT Diesel Engine Parameter Trending
  - Jacket Water Temp
  - Lube Oil Temp
- Diesel Panel Alarms
  - "A" Diesel AR-D/G-A-9 Jacket Water Temp

AR-D/G-A-11 Lube Oil Temp

• "B" Diesel AR-D/G-B-9 Jacket Water Temp

AR-D/G-B-11 Lube Oil Temp

## Contingency

- Four Inch Normal Supply in Addition to Cross-Ties
- Fire Water System Backup Capability
- EOP Support

enfconf:18

## **101XU PRESENTATION**

#### Auxiliary Feedwater System

## April 1991

### **Detectability of Functional Failures**

- Standby Auxiliary Feedwater Backup
- EOP Support

<u>\_</u>1

- Bearing Flow Verified by Operator Twice Per Shift
- Monthly Periodic Tests
  - Cycles Not Closed MOV Actuated 101XU Valves
  - Cycles Manual 101 XU Valves
  - Functionality of Valves Verified by Downstream Flush



**101XU FAILURE PRESENTATION** 

Safety Injection System Evaluation

April 1991

Redundant Supply

- Monthly PT Bearing Temp Checked
- Periodic Test Procedure Requires Restoration Valves Upon Safety Injection Immediately
- Quarterly PT Bearing Temp Checked, Vibration Recorded
- Annual Bearing Flush per M-11.12.2, "#1-A, 1-B, 1-C Safety Injection Pump O.B. Jacketed Bearing Service Water Cooling System Maintenance"
- Indirect Visual Feedback (sweating)

## 101XU FAILURE PRESENTATION 1992 Outage Feedback

Second Failure Confirmed - Valve V-4690



 M-11.12.2 Annual Bearing Flush Safety Injection Pumps (SIPs) Results

- All SIP Bearings Clean
- Flow Present
- Evaluation Remained Valid
- No Change in Program Direction

## SAFETY INJECTION PUMP THRUST BEARING COOLING





(S

# 1993 SWS OUTAGE PREPARATION PROJECT



#### 101XU FAILURE PRESENTATION

#### **Overall Conclusions**

- Had Experienced Component Failures
- Recognized 101XUs Installed in Safety Related Systems
- Recognized Need for Inspection and Replacement Program Prior to Confirming Second Failure
- Evaluation to Detect Functional Failure on Safeguards Equipment
- 1992 Outage Feedback Two 101XUs Found Operable
- 1993 SWS Program Established Sensitive to 101XU Valves
- Failures Detected (Self Identified) During 1993 AI&O
- Though Redundancy Reduced, No Functional Failures Occurred
- Aggressive Corrective Action Performed During 1993 AI&O
- FURTHER DETECTION, FURTHER CORRECTIVE ACTION

#### enfconf:24

## GINNA VALVE INSPECTION PROGRAM (PHASE 5)

### <u>Scope</u>

- 41 Valve Refurbish/Replacements
- 7 Actuators
- 25 MOV Diagnostics
- 450 Total Valves

<u>Results</u>

- Slight to Severe Corrosion of Valve Body Guides
- Slight to Severe Corrosion of Carbon Steel Disc's.
- Silt and Corrosion Build-up Inside Some Valves and Pipes
- Some Pitting, Scratches, and Cracks in Seat Surfaces
- + Larger Valves Having Carbon Steel Discs Had Corrosion; However, Larger Volume of Metal Resulted in Lower Probability of Failure
- + Stainless Steel and Bronze Components Did Not Experience Abnormal Degradation
- + Did Not Observe Significant Pipe Wall Thinning or Pitting
- + Severe Carbon Steel Disc Corrosion Did Not Occur on Closed Valves in the Service Water System
- + Carbon Steel Disc Corrosion Did Not Occur on Valves Installed in Non-Service System

## SERVICE WATER VALVE INSPECTION AS-FOUND CONDITIONS

#### VALVE

1 (1

#### MAKE

#### **CONDITION**

*	MOV-4780	Rockwell	Scale Build-up Prevent Full Closure
*	MOV-4609	Rockwell	Good Condition
*	MOV-4611	Crane 101XU	Good Condition
	V-4640	Crane 155	No Corrosion, Seat Defects
*	MOV-4013	Crane 101XU	Slight Corrosion Wedge, Silt
*	MOV-4027	Crane 101XU	Slight Corrosion Wedge, Silt
*	MOV-4028	Crane 101XU	Slight Corrosion Wedge, Silt
	V-4098	Crane 101XU	Good Condition
	MOV-4613	Crane 101XU	Extensive Corrosion
*	V-4760	Crane 101XU	Extensive Corrosion Disc & Guide
*	V-4669	Crane 101XU	Disc and Stem Separated
	V-4668B	Velan	Good Condition, Corrosion Guide
	V-4345	Crane 101XU	Good Condition
	V-4344	Crane 101XU	Good Condition
*	V-4739	Crane 101XU	Extensive Corrosion Disc & Guide
*	V-4738	Crane 101XU	Disc and Stem Separated
	MOV-4615	Crane 155	Seat Defects
	V-4635	Atwood Morrill	Good Condition
	V-9626A	Borg Warner	Good Condition
	V-4618	Crane 150	Seat Defects
	V-4779	Crane 155	Good Condition
	V-4625	Crane 47½ XU	Good Condition, Lapped Seats
	V-4626	Crane 47 <sup>1</sup> / <sub>2</sub> XU	Seat Defects
	MOV-4664	Crane 47½ XU	Corroded Guide and Bolting
	V-475 <b>7</b>	Atwood Morrill	Good Condition
	V-4627	Atwood Morrill	Good Condition
	V-4628	Atwood Morrill	Good Condition
	V-4756	Crane 150	Good Condition, Seat Pitting
	V-4641	Atwood Morrill	Good Condition
	V-4642	Atwood Morrill	Good Condition

## SERVICE WATER VALVE INSPECTION AS-FOUND CONDITIONS (contd)

	VALVE	MAKE	CONDITION
*	MOV-4663	Crane 101 XU	Extensive Corrosion Disc & Guide
*	V-4678	Crane 101 XU	Corrosion Disc & Guide
*	V-4675	Crane 101 XU	Extensive Corrosion Disc & Guide
*	V-4690	Crane 101 XU	Extensive Corrosion Disc & Guide
*	V-4732	Crane 101 XU	Corrosion Disc & Guide
*	V-4689	Crane 101 XU	Extensive Corrosion Disc & Guide
*	V-4674	Crane 143 1/2 XR	Plug Unscrewed From Stem
	V-4758	Atwood Morrill	Good Condition
	V-4636	Atwood Morrill	Good Condition

\* Valves Replaced

(16

. 15

### CRANE 101XU VALVES

## Application

(3

- 27 Original Equipment Valves Were Installed
- 17 Valves Installed in Service Water System
- 7 Installed in Component Cooling Water System
- 3 Installed in Auxiliary Feedwater System

## Inspection Scope

- 6 Valves Scheduled for Inspection
- 8 Service Water Valves Added to Inspection Scope
- 3 Auxiliary Feedwater Valves Added to Scope
- 1 Component Cooling Water Valve Added to Scope

## CRANE 101XU VALVES

### Present Status

- 14 Valves in Service Water System Were Replaced With Crane 47 <sup>1</sup>/<sub>2</sub> Valves
- 3 Valves in Auxiliary Feedwater System Were Inspection and Refurbished
- 1 Valve in Component Cooling System Inspected and Refurbished
- 3 Valves in the Service Water System Were Not Inspected
  - + Two Are Normally Closed Valves, Not Required to be Open
  - + Remaining Valve is Normally Open on an Instrumented Heat Exchanger Where Failure Would be Detected

## SERVICE WATER VALVE INSPECTION

### **Future Activities**

1994

**n** 

- Replace the Remaining 13 Crane 101XU Valves
- Replace the Remaining Four Butterfly Valves
- Remove "A" Loop from Service and Perform Phase 6 Inspection Scope

1995

• Complete Phase 7 of Valve Inspection Program

## SAFETY IMPLICATIONS

1. Was SI Pump Damaged During PT-2.7 With Valve V-4739 Closed?

No. SI Pump Does Not Operate During PT-2.7. Subsequent Testing of SI Pump Indicates Acceptable Performance.

2. Could SI Pump Have Operated if Accident Occurred During PT-2.7?

Yes. Procedure A-1101 Provides Assurance of System Realignment.

Conservatively Estimate Time to Realign: 20 Minutes - 5 R&T Personnel in Field During Test

Design Analysis DA-ME-93-101 Indicates Pump Operation for at Least 20 Minutes Without SW Cooling

High Confidence of Extended (Hours -- Indefinite) Operational Capability Without Service Water Cooling Based On:

- Test of Comparable (TDAFW) Pump
- Pump Vendor Correspondence
- "Cool" Water Being Pumped (175°F)
- High Pump Recirculation Flowrate

Conclusion: SI Pumps Operable - Valve V-4739 Operable

÷Χ

. 1

# SAFETY IMPLICATIONS (contd)

3. What If Valve V-4739 Failure During Previous PT?

Failure of Both Valves V-4738 and V-4739 Detectable By SI Pump Monthly PTs

4. What if Valve V-4739 Failed During Postulated Accident?

High Confidence of Extended Operational Capability Pumping Cool Water

FR-C.1 and FR-C.2 Provide Guidance for Loss of SI:

- Heat Removal and Depressurization Via Steam Generators
- Inventory Control Via Charging and Accumulators

Not Explicitly Analyzed in UFSAR Accident Analysis -Beyond Design Basis

t

## COMPARISON OF PUMPS/BEARINGS

- SI Pump: 3-WTS-811 With Double Ball Thrust Bearing 3550 RPM
- TDAFW: 3-WTL-87 With Double Ball Thrust Bearing 4650 RPM

п.,

## PLANT MANAGEMENT PERSPECTIVES

## Lessons Learned - Opportunities for Improvement

- Passive Failure Identification
- In-Situ Diagnostics
- Enhanced Inspection Program
- Increased Sensitivity for Generic Application

## Industry Applicability

18

- Nuclear Network
- Voluntary LER

## **Future Actions**

- Completion of Valve Improvement Program
- Augmented Preventive Maintenance Schedule



## ENFORCEMENT CONFERENCE Conclusions

- RG&E has implemented a comprehensive valve inspection, refurbishment, and upgrade program
- Although not documented, plant management did assess the common mode safety impact of non-safety-related valve failure on safety systems

 Required safety functions were not compromised by 1993 outage findings

S

## **Underground Piping**

Purpose of Discussion:

14.

- 1. Describe the potential underground leak from the Ginna Service Water System and its safety assessment.
- 2. Discuss RG&E's plans.

## Background

### Leak Identification:

16.

- Standing water was identified on the floor of the Screenhouse basement in WR/TR #9122322. The water was entering through the wall penetration for the Circulating Water lines.
- 2. The water was analyzed for the presence of chlorine both during a SW chlorination period and a nonchlorination period. The concentration and trend of chlorine in the water indicated that it can be SW. For the purpose of assessing safety, the water in the Screenhouse basement is assumed to be entirely SW.
- 3. NCR 92-001 now controls this issue.

## Piping Design:

- 1. The underground Service Water pipe is constructed per AWWA C301-58 from 3/16" structural steel plate seam welded with a concrete liner. The pipe is wrapped with a high strength wire mesh and cast or grouted on the exterior with concrete. The end connections are bell and spigot type with the joint mortared on the exterior. See Price Brothers drawing D-340-A (attached).
- 2. The pipe is laid into a concrete cradle with horizontal changes of direction placed in concrete thrust blocks. See RG&E drawings 33013-54-J and 33013-53-B as separate illustrations and SK-BUGRDL attached. Also attached is a copy of an original construction photograph.





## Assessment

### Piping Design Assessment:

11

- 1. The most likely location for a leak is through one of the bell and spigot joints to the elbows that bring the Service Water line under the Circulating Water lines. The leak is not considered likely in the weld since the prestressed exterior provides a major portion of the structural strength and the inner concrete liner provides resistance to water passing through to the location of the weld defect.
- 2. Nuclear Network was searched for the topics "underground" or "buried pipe". A variety of construction methods, materials and failures are present. The construction methods described are significantly different than at Ginna Station. Based on this search, the industry has not experienced significant leakage or required extensive maintenance of the type of piping found at Ginna Station.

### Screenhouse In-Leakage Assessment:

- 1. The Screenhouse in-leakage has been at nominally 1 gpm, depending on the amount of groundwater contributing to the sump flow. Note that in monitoring the sump flow, an increase to 5 gpm prompts further action immediately.
- 2. Leakage from the Service Water system has been evaluated in EWR 10110. This EWR examined the 1993 SI alignment SW system flow test data. The components most sensitive to leakage from the system headers are the Containment Air Coolers. The design required flow is 970 gpm per cooler and the test had a minimum cooler flow of 1080 gpm. Significant leakage on the order of 200-300 gpm over the test conditions (including the current SW header condition) could be experienced without affecting design requirements.
- 3. The system was justified for continued operation in NCR 92-001 based on the adequacy of Service Water supply, the monitoring measures to identify significant leakage increases, and the significant structural design capability of the underground piping.

## Actions to Date

### **Evaluated Design:**

15

. (1

- 1. As described above, the design has significant structural strength and the pressure boundary is not susceptable to general degradation.
- 2. The weakest pressure retaining element is the bell and spigot joint particularly where there are changes in direction not in thrust blocks.

### Monitoring:

- 1. Quantified leak into screen house via sump actuations, Operators record the basement sump elapsed time from an installed counter as part of their rounds.
- 2. Established an action limit of 5 gpm to ensure that any change in the leak characteristic is evaluated prior to significantly degrading the margin above the required Service Water flow rate.

## Actions Planned through '94 Outage

## Monitoring:

0

n <sup>sik</sup> Rj

- 1. Continue monitoring Screenhouse basement sump actuations.
- 2. Evaluate and implement, where appropriate, techniques for more precisely locating the source of the water. This may include taking core samples of the soil or utilizing a dye or tracer.

## Inspection:

- 1. Resolve any comments on the design provided for installing access flanges to the underground piping and install the flanges.
- 2. Select the robotic inspection device for verifying the internal material condition of the piping and perform the inspection.

## **Repairs:**

- 1. If the material condition of the pipe is as expected without fissures in the concrete liner and no significant gap in the seam at the bell and spigot joint, a continued program of monitoring and inspection may be invoked.
- 2. If there is material degradation of the pipe, the appropriate repair will be implemented. The most probable path will be to use a "sleeve" design that can be installed from the flanged access without excavation.

## Conclusions

### **Underground Leak and Safety Assessment:**

- 1. Any SW underground leak is most likely located at one of the bell and spigot joints near the Circulating Water lines.
- 2. The Screenhouse in-leakage is monitored and stable.
- 3. The Screenhouse in-leakage is small when compared to the allowable of 200-300 gpm.

### Plans:

.1

**د** ۲ بور

- 1. Continue monitoring Screenhouse basement sump flow.
- 2. Inspect the internal material condition of both underground headers.
- 3. Repair as indicated by significant changes in leak status or results of material condition inspection.

······



## ENFORCEMENT CONFERENCE

Conclusions

- Ginna underground service water system
   piping leakage is believed to be small and stable
- Sudden increase in leakage is highly unlikely
- Substantial flow margin availability
- 1994 outage inspection program still under development
- Additional monitoring planned
- Inspection of piping internals will rectify absence of anomalies in pipe condition



## **ENFORCEMENT CONFERENCE**

*Conclusions (continued)* 

- Based on piping design, lack of identifiable catastrophic failure mechanism, and large margin of safety to required flow, current safe operation is assured
- RG&E will keep NRC staff informed of plans