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FACIL:50-244 Robert Emmet Ginna Nuclear Plant, Unit 1, Rochester G 05000244
AUTH.NAME AUTHOR AFFILIATION
MECREDY,R.C. Rochester Gas & Electric Corp.
RECIP.NAME RECIPIENT AFFILIATION
Document Control Branch (Document Control Desk)

SUBJECT: Advises of util plans to resolve open item documented in insp rept 50-244/93-20,dtd 931118,by making proposal that consistently applies term "containment isolation boundary," as well as defining allowed outage times.

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ROBERT C. MECREDY
Vice President
Nuclear Operations

December 21, 1994

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

Subject: Containment Isolation Boundaries (TAC M77849)
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Johnson,

By Reference a, RG&E proposed to relocate the listing of containment isolation valves from technical specifications (TS) to the UFSAR and plant procedures consistent with Generic Letter 91-08. Included with this license amendment request, were proposed changes to TS 3.6.3.1 to correct several inconsistencies which existed in the specification. These inconsistencies included the use of containment isolation valves in the specification when flanges and closed systems also provide containment barriers, and the acceptability of using a closed system to isolate a failed isolation valve. The NRC Staff approved the use of containment isolation boundary in the specification in order to correct the nomenclature concern but did not approve the use of a closed system as an acceptable device for a failed isolation valve (Reference b). The use of a closed system was withdrawn by RG&E in Reference c in an effort to expedite approval of the remaining requested changes, which were subsequently approved as Amendment No. 54.

Our presently approved TS 3.6.3.1 now states that with a containment boundary inoperable, the boundary must be restored to OPERABLE status within 4 hours or the penetration must be isolated using a valve or flange. Thus, a closed system which is defined as a boundary in the bases for TS 3.6.3.1, must be OPERABLE as a containment isolation boundary, but cannot be used to isolate a failed isolation valve. This discrepancy has continued to cause problems at Ginna Station due to the design of several penetrations that only have one installed isolation valve (consistent with General Design Criteria 57). Any failure of this valve requires the isolation of multiple system trains even though a fully missile protected, seismic, leak-tight, closed system is installed and available. This concern is also documented in NRC Inspection Report 50-244/93-20 (Reference d).

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Following issuance of Amendment No. 54, RG&E requested additional clarification on why the use of a closed system was unacceptable for use as a containment isolation barrier to compensate for an inoperable containment isolation valve. The NRC responded with a Safety Evaluation (Reference e) which stated that the fundamental basis for unacceptability was that RG&E's proposal was inconsistent with the requirements of Standard Technical Specifications (STS), since the STS only use the term "containment isolation valves" and not boundaries for isolating failed valves. We acknowledge this difference, but contend that the STS wording is an oversight since closed systems are required to be OPERABLE per STS LCO 3.6.3 (see bases for NUREG-1431, LCO section), but are not credited with providing an isolation function for failed valves. It should also be recognized that the STS can be, and are currently being, revised as necessary to address discrepancies such as these.

At this time, we are planning to resolve the open item documented in Reference d by making a proposal that consistently applies the term containment isolation boundary, as well as defining allowed outage times and action statements, during our conversion to the Improved Standard Technical Specifications.

Very truly yours,

Robert C. Mecredy

References:

a. Letter from R.C. Mecredy, RG&E, to A.R. Johnson, NRC, Subject: "Removal of the Table of Containment Isolation Valves from Technical Specifications," dated November 30, 1992.

b. Letter from A.R. Johnson, NRC, to R.C. Mecredy, RG&E, 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)", dated March 11, 1993.

c. Letter from R.C. Mecredy, RG&E, to A.R. Johnson, NRC, Subject: "Removal of the Table of Containment Isolation Valves from Technical Specifications," dated July 13, 1993.

d. Letter from J.C. Linville, NRC, to R.C. Mecredy, RG&E, Subject: "NRC Inspection 50-244/93-20 (9/12/93 - 10/23/93)," dated November 18, 1993.

e. Letter from A.R. Johnson, NRC, to R.C. Mecredy, RG&E, Subject: "R.E. Ginna Nuclear Power Plant - Evaluation of Proposed Requirements for Containment Isolation Boundaries Related to License Amendment No. 54 (TAC No. M77849)", dated March 14, 1994.

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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