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See Rpt.

SUBJECT: Forwards info requested from 950921 & 1016 telcons re testing of ventilation sys & impact of 24-month fuel cycles.

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ROBERT C. MECREDY
Vice President
Nuclear Operations

October 18, 1995

U.S. Nuclear Regulatory Commission
Document Control Desk
Attention: Mr. Allen R. Johnson
Project Directorate I-1
Washington, D.C. 20555

Subject: Conversion to Improved Technical Specifications
24 Month Cycle Evaluation, Ventilation Testing Requirements (TAC No. 92965)
Rochester Gas & Electric Corporation
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

References: (a) Letter from R.C. Mecredy, RG&E, to A.R. Johnson, NRC, Subject: *Application for Amendment to Facility Operating License, Conversion to Improved Technical Specifications*, dated May 26, 1995.

(b) NUREG-1431, *Improved Standard Technical Specifications for Westinghouse Plants*, Revision 1, April 1995.

Dear Mr. Johnson,

On September 21, 1995 and October 16, 1995, separate conference calls were held between RG&E and the NRC with respect to testing of ventilation systems and the impact of 24 month fuel cycles. During the first conference call, the NRC requested that RG&E perform a review of historical ventilation test data and document the results of this review. During the second conference call, the NRC requested that RG&E address certain differences between the Ventilation Filter Testing Program (VFTP) submitted by RG&E (Ref. (a)) and that contained in NUREG-1431 (Ref. (b)). The purpose of this letter is to provide the requested information from these two conference calls.

RG&E has reviewed plant records from 1980 through the present for the four ventilation systems contained in the proposed improved technical specifications (ITS) for Ginna Station (Ref. a):

a. Containment Post-Accident Charcoal System
b. Control Room Emergency Air Treatment System (CREATS)
c. Spent Fuel Pool (SFP) Charcoal Adsorber System
d. Containment Recirculation Fan Coolers (CRFC)

The results of this review are provided in the attached table. This review shows that between January 1980 and September 1995, there have not been any observed failures in these four systems. This includes data from filter, damper, fan, and actuation logic testing. Copies of the current procedures which implement this testing are also attached for your information. As such, RG&E believes this data supports extending the surveillance testing interval from 18 months to 24 months for refueling outage based tests.

Please note that RG&E has no plans to adjust these current ventilation testing frequencies following implementation of the ITS except to change from annual to 18 month tests in support of the upcoming fuel cycle change. However, RG&E reserves the right to adjust these test frequencies in the future if continued system reliability is maintained.

The NRC also requested during the October 16, 1995 conference call that RG&E address the following issues:

1. *The RG&E proposed VFTP only references Regulatory Guide 1.52, Revision 2. This regulatory guide limits refueling outage based surveillance test intervals to 18 months versus the proposed 24 months. The bases for proposed SR 3.6.6.5, SR 3.6.6.6, SR 3.7.9.2, and SR 3.7.10.2 should specifically address this issue.*

   RG&E proposes to add the following sentence to the end of each of the four referenced bases sections:

   > However, the maximum surveillance interval for refueling outage tests is based on 24 month refueling cycles and not 18 month cycles as defined by Regulatory Guide 1.52.

   RG&E ITS comment #149 has been opened to track incorporation of this sentence (attached).

2. *The VFTP specified in NUREG-1431 contains references to ASME N510-1989 for flowrate testing and ASTM D3803-1989 for laboratory testing. The RG&E proposed VFTP only references Regulatory Guide 1.52, Revision 2 which does not contain equivalent level of detail for these tests.*

   The current Ginna Station procedures for testing of the four subject ventilation systems contain references for the following:

a. Containment Post-Accident Charcoal System

ANSI N510-1989, Section 5.5.1.6 (Moisture Separators)
ANSI N510-1980

b. Control Room Emergency Air Treatment System (CREATS)

ANSI N510-1975

c. Spent Fuel Pool (SFP) Charcoal Adsorber System

ANSI N510-1980

d. Containment Recirculation Fan Coolers (CRFC)

ANSI N510-1989, Section 5.5.1.6 (Moisture Separators)
ANSI N510-1980

As can be seen, references to ANSI N510 vary between the 1975, 1980, and 1989 editions. RG&E would prefer not to specify which edition of this standard is used in the VFTP contained in the Administrative Controls section of technical specifications since this could not be changed (even to a more recent edition) without prior NRC approval. In addition, Regulatory Guide 1.52, Revision 2 specifically references ANSI N510-1975 for testing. Since there is no existing regulatory guide endorsing a later edition to this standard, RG&E proposes to maintain this information in station procedures as is the current practice. There are other similar programs which reference early standards and regulatory guides both in the ITS and current technical specifications (e.g., ITS 5.3.1).

With respect to ASTM D3803-1989, RG&E does not believe that this reference is necessary in the VFTP since Regulatory Guide 1.52, Revision 2 references ANSI N509-1976. Since there is no existing regulatory guide endorsing a later edition to this standard, RG&E proposes to maintain this information in station procedures as is the current practice.

3. *The VFTP in NUREG-1431 specifically lists the minimum flowrate through HEPA and charcoal filters while the RG&E proposed VFTP does not.*

The RG&E proposed VFTP is based on the current Ginna Station technical specifications which do not specify this flowrate information. RG&E does not believe that this level of information is necessary in the Administrative Controls section. However, RG&E proposes to add to the following to the bases for SR 3.6.6.5, SR 3.6.6.6, SR 3.7.9.2, and SR 3.7.10.2 to address this issue:

[SR 3.6.6.5]

The minimum required flowrate through each of the two post-accident charcoal filters is 33,000 cubic feet per minute at accident conditions (or 38,500 cubic feet per minute at normal operating conditions).

[SR 3.6.6.6]

The minimum required flowrate through each of the four CRFC units is 33,000 cubic feet per minute at accident conditions (or 38,500 cubic feet per minute at normal operating conditions).

[SR 3.7.9.2]

The minimum required flowrate through the CREATS filtration train is 2,000 cubic feet per minute.

[SR 3.7.10.2]

There is no minimum required flowrate through the SFP charcoal adsorbers since SR 3.7.10.1 requires verification that a negative pressure is maintained during fuel movement in the Auxiliary Building. As long as this minimum pressure is maintained by drawing air from the surface of the SFP through the SFP charcoal adsorbers, the assumptions of the accident analyses are met.

RG&E ITS comment #150 has been opened to track incorporation of this information into the bases (attached).

4. *The VFTP in NUREG-1431 contains detailed discussion of the allowable methyl iodide penetration and associated "safety factor" while the RG&E proposed VFTP only contains the allowable penetration value.*

The VFTP in NUREG-1431contains a Reviewer's Note stating that the "allowable penetration = [100% - methyl iodide efficiency for charcoal credited in staff safety evaluation] / (safety factor)" where the safety factor is "5 for systems with heaters" and "7 for systems without heaters." The RG&E proposed VFTP requires a penetration of "< 1%" for all four ventilation systems. In addition, the methyl iodide efficiency of all four ventilation systems must be "≥ 90%." Placing these values into the NUREG-1431 Reviewer's note yields:

$(100\% - 90\%) / (\text{safety factor}) \leq 1\%$

$\text{safety factor} = 10$

Therefore, the actual safety factor is greater than that proposed in NUREG-1431 for systems with or without heaters. Consequently, RG&E does not believe that this safety factor limit needs to be added to the VFTP.

Please direct any additional questions related to these issues to Mark Flaherty at (716) 724-8512.

Very truly yours,

Robert C. Mecredy

MDF\752

attachments

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Ginna Senior Resident Inspector

COMMENTS/CHAPTER

18-Oct-95

CHAPTER/LCO: 5.5.10

ITEM #: 150

DESCRIPTION OF ISSUE: Add discussion on minimum required flowrates to the bases for SR 3.6.6.5, SR 3.6.6.6, SR 3.7.9.2, and SR 3.7.10.2. This closes commitment in 10/18/95 letter to NRC.

DATE IDENTIFIED: 10/18/95

DATE CLOSED:

TRAVELLER EXIST?: No

TRAVELLER NAME:

COMMENTS:

CHAPTER/LCO: 5.5.10

ITEM #: 149

DESCRIPTION OF ISSUE: Add the following to the last sentence of the bases for SR 3.6.6.5, SR 3.6.6.6, SR 3.7.9.2, and SR 3.7.10.2, "However, the maximum surveillance internal for refueling outage tests is based on 24 month refueling cycles and not 18 month cycles defined by Regulatory Guide 1.52." This closes commitment in 10/18/95 letter to NRC.

DATE IDENTIFIED: 10/18/95

DATE CLOSED:

TRAVELLER EXIST?: No

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