

CATEGORY 1

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MULLER, K.A. Rochester Gas & Electric Corp.
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SUBJECT: Rev 0 to "Inservice Testing Program."

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TO: Guy Vissing, NRC (301) 415-2102
FROM: Mark Flaherty, RG&E (716) 724-8512

50-244

Chy,

I am faxing you the following information:

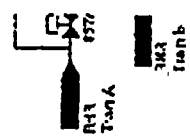
- (1) *One-line diagrams of the Safety Injection (SI) and Containment Spray (CS) systems which show the subject MOVs (897 and 898). These valves are required to be open during power operation since the ESPAS signal with respect to RCS pressure can actuate the SI pumps prior to reaching the shutoff head of the SI pumps (1700 psig versus 1400 psig). Therefore, maintaining the MOVs open ensures that the SI pumps are not deadheaded during the time frame it takes for the RCS pressure to drop from 1700 psig to 1400 psig. The valves are also required to be capable of closing during use of the SI system for high-head recirculation. That is, closure of the MOVs prevents the addition of highly radioactive sump fluid to the RWST. Per Technical Specifications LCO 3.5.2 and 3.5.3, at least one SI train must be operable above 200 F.*
- (2) *Copy of the Ginna Station IST Program With Respect to MOVs 896A and 896B. As shown on the one-line diagrams, MOVs 896A and 896B provide suction to the SI and CS systems. Per Cold Shutdown justification CS-17, RG&E only exercises these valves during cold shutdown since closure of the MOVs renders both SI and CS inoperable. This is very similar to the 897 and 898 valves.*
- (3) *Copy of the NRC SER Which Approved the Current IST Program For Ginna. There is only a single sentence which approves CS-17.*

Based on the above, there is precedent for only exercising 897 and 898 at cold shutdown. The next required test of these valves is 11/11/96 (includes 25% extension). If the alternate testing frequency is not provided by this date, RG&E would be forced to enter LCO 3.0.3 to perform an ASME required test or shutdown Ginna.

me

GINNA PSA S
SAFETY NJEC

Valve



180013

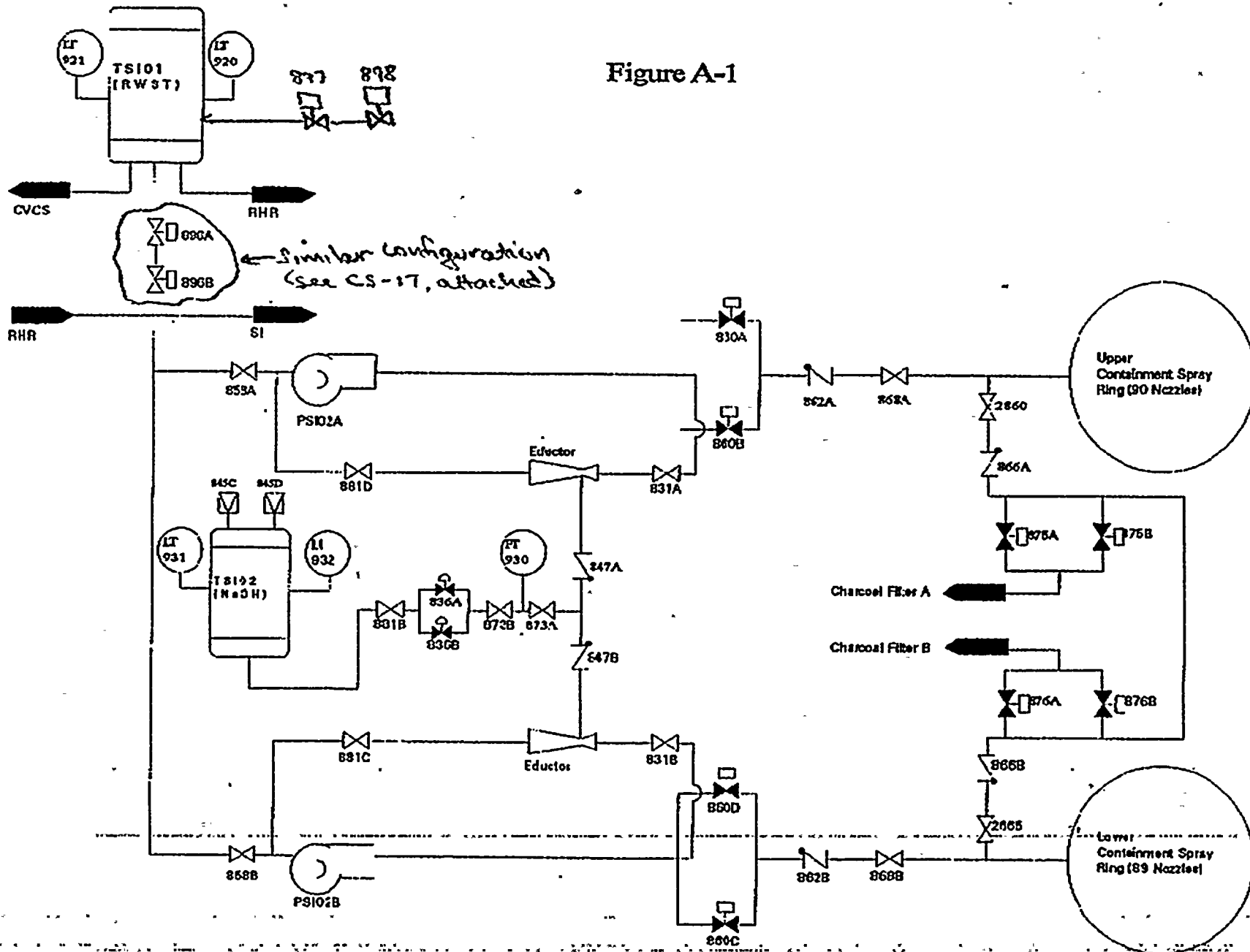
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11/11
A001

GINNA PSA SYSTEM WORK PACKAGE PSA-06
CONTAINMENT SPRAY SYSTEM

REVISION 0
APPENDIX A: PAGE 2 OF 2

Figure A-1





INSERVICE TESTING PROGRAM

Revision 0
Page 1 of 87

INSERVICE TESTING PROGRAM

Effective Date: 2/23/96

Prepared by: K. Amullen Date: 2/15/96

Quality Assurance Review by: R.D. Davis Date: 2-21-96

Approved by: D.R. Markunli Date: 2/23/96

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PROGRAMRevision 0
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- CS - 15: Valves 852A & B are Residual Heat Removal (RHR) discharge motor operated valves to the reactor vessel. These valves open to provide safety injection flow to the reactor vessel. These valves should not be exercised during normal power operation as this would reduce the system to single-valve-protection between the RCS and RHR system and could result in an intersystem LOCA outside of containment. Testing will be performed during cold shutdown.
- CS - 16: Deleted (853A/B are addressed in VR-3)
- CS - 17: Valves 896 A & B are Refueling Water Storage Tank (RWST) outlet isolation valves. Exercising these valves during power operation is impractical. Failure of one of these valves in the closed position during power operation would render both containment spray and safety injection trains inoperable which would require shutting down the reactor. Testing will be performed during cold shutdown.
- CS - 18 Valve 702 provides a flow path from the Residual Heat Removal (RHR) discharge line to the letdown header for pressure relief. Exercising this check valve during power operation would require isolating letdown which could result in loss of pressurizer level control and cause a reactor trip. Testing will be performed during cold shutdown.
- CS - 19: Valves 1819A thru G are containment pressure transmitter isolation valves. These normally open valves are containment isolation valves. Exercising these valves during power operation can disable associated pressure channels and cause a plant trip function to be inoperable. Testing will be performed during cold shutdown.
- CS - 20: Deleted (8419)



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20549

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April 15, 1991

Docket No. 50-244

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PUBLISHED

Mr. Robert C. Macredy, Vice President
Ginna Nuclear Production
Rochester Gas & Electric Corporation
89 East Avenue
Rochester, New York 14649

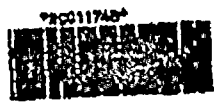
Dear Mr. Macredy:

SUBJECT: R. E. GINNA NUCLEAR POWER PLANT INSERVICE TESTING (IST) PROGRAM
FOR PUMPS AND VALVES, 1990-1999 THIRD 10-YEAR INTERVAL
(TAC NO. 73380)

By letter dated May 23, 1989, and subsequent letters dated October 27, 1989; February 15, March 14, April 6, April 12, 1990, and January 22, 1991, Rochester Gas and Electric Corporation submitted to the NRC the IST Program and additional information for the IST Program, third 10-year interval, at the R. E. Ginna Nuclear Power Plant. The NRC has reviewed and evaluated the program and additional information provided.

The enclosed Safety Evaluation (SE) was prepared by the NRC to provide the results of the staff review. The Code of Federal Regulations, 10 CFR 60.55a(g), requires certain Class 1, 2, and 3 pumps and valves in water-cooled nuclear power facilities to meet the inservice testing requirements stated in the ASME Boiler and Pressure Vessel Code (Code), Section XI; specifically Subsection IWP, "Inservice Testing of Pumps in Nuclear Power Plants," and Subsection IWV, "Inservice Testing of Valves in Nuclear Power Plants." Each facility is required to establish a program for the inservice testing of pumps and valves which is updated every ten years to meet the requirements in the latest approved edition and addenda to Section XI of the Code. The program is submitted to the NRC for review and approval of the relief requests. The review entails verifying that the program is based on the applicable Code edition and addenda, verifying that all pumps and valves included in the program are subjected to appropriate periodic testing, and verifying the acceptability of the requests for relief from the requirements of Subsections IWP and IWV.

The IST Program and additional information addressed in this evaluation covers the interval from January 1, 1990 through December 31, 1999, and supersedes all previous IST Program submittals.



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DF01

DFC	: PDI-3/LA	: PDI-3/PH	: OGC	: PDI-3/D
NAME	: R. R. Book	: A. Johnson	: Moore J. Hill	: S. Shanley/act
DATE	: 3/5/91	: 5/20/91	: 3/29/91	: 4/11/91

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testing requirements apply only to component testing (i.e., pumps and valves) and are not intended to provide the basis to change the licensee's current Technical Specifications for system test requirements.

Section 2 of this report presents the Rochester Gas and Electric Corporation bases for requesting relief from the Section XI requirements for the Robert E. Ginna Nuclear Power Plant pump testing program and the reviewer's evaluations and conclusions regarding these requests. Similar information is presented in Section 3 for the valve testing program.



Justifications for exercising Category A, B, and C valves during cold shutdowns and refueling outages instead of quarterly during power operations were reviewed and found acceptable except as noted in Appendix A.

Inconsistencies and omissions in the licensee's IST program noted during the course of this review are listed in Appendix A. The licensee should resolve these items in accordance with the evaluations, conclusions, and guidelines presented in this report.

April 15, 1991

The NRC staff with technical assistance from EG&G Idaho Inc. (EG&G), has reviewed and evaluated the IST Program and requests for relief submitted for the Robert E. Ginna Nuclear Power Plant. The staff adopts the evaluations and conclusions contained in the Technical Evaluation Report (TER) prepared by EG&G. The enclosed SE incorporates the TER which is attached to this SE. We are recommending that relief be granted from the testing requirements which we have determined would be impractical to perform, where compliance would result in a hardship without a compensating increase in safety, and where the proposed alternative testing provides an acceptable level of quality and safety. We have determined that the IST Program relief requests are acceptable for implementation provided the items identified in Appendix A of the TER (Attachment 2 of the Enclosure) are addressed within the time frame specified in the enclosed SE.

The licensee is required to comply with the IST Program defined in the above referenced letters where relief has been granted in the enclosed SE. IST Program changes such as additional relief requests or changes to approved relief requests should be submitted for staff review but should not be implemented prior to review and approval by the NRC. New or revised relief requests meeting the positions in Generic Letter (GL) 89-04 (GL 89-04 Enclosure 1), should be submitted to the NRC staff but can be implemented provided the guidance in GL 89-04, Section D, is followed. IST Program changes that involve additions or deletions of components from the IST Program should be provided to the NRC.

This submittal completes the technical review performed by the NRC staff under TAC Number 73380.

Sincerely,

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

Enclosure:
As Stated

cc w/enclosure:
See next page

OFC	:PDI-3/LA	:PDI-3/PH	:OGC	:PDI-3/D
NAME	:MR. [Signature]	:AJohnson	:J. Moore	:S. Shankar
DATE	:3/28/91	:3/28/91	:3/29/91	:4/11/91

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Values of concern

Figure A-1

