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VISSING,G.

SUBJECT: Requests rev to cold shutdown justification CS-10 & approval of proposed cold shutdown justification CS-36.

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ROBERT C. MECREDY
Vice President
Nuclear Operations

July 31, 1997

U.S. Nuclear Regulatory Commission
Document Control Desk
Attn: Guy Vissing
Project Directorate I-1
Washington, D.C. 20555

Subject: Cold Shutdown Justification CS-10 and CS-36
Inservice Testing (IST) Program for Pumps and Valves
1990-1999 Third 10-Year Interval, Revision 2
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Vissing:

The purpose of this letter is to seek acceptance of a revision to cold shutdown justification CS-10, and approval of a newly proposed cold shutdown justification CS-36.

The revision to CS-10 is not intended as a change but to more clearly define the testing intervals and to more closely tie testing to plant cooldown low temperature overpressure protection (LTOP) enabling requirements. Since LTOP enabling requirements change due to reactor pressure vessel aging, the CS-10 testing point during cooldown will also change. This would necessitate revisions throughout plant life since a temperature and pressure point are specifically identified in the current CS-10. The basis for the LTOP enabling is controlled through the Pressure-Temperature Limits Report (PTLR) which uses a methodology that has received prior NRC approval.

Cold justification CS-36 is being submitted to address exercising of two newly-incorporated valves 3506 and 3507. The valves serve as block valves from the main steam line to the atmospheric relief valves (ARVs). They have been added to the inservice testing program (IST) as a result of implementation of the Improved Technical Specifications (ITS). The request for approval of this cold shutdown justification is being made in accordance with the provisions of 10CFR50.55a(f)(5)(iii) in that testing these valves at power renders the ARVs unable to perform their relief function and allow for emergency heat removal. The testing also requires the ARVs to manually be stroked during power operation which introduces the possibility of power excursions. In lieu of performing a quarterly stroke test of these values, RG&E proposes

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to employ radiographic examinations to verify disk position. Further discussion is provided in the attached cold shutdown justification. Your action on this by October 1, 1997 is requested to support the fall refueling outage.

Very truly yours,

Robert C. Mecredy

REJ/475

xc: Mr. Guy Vissing (Mail Stop 14B2)
Project Directorate I-1
Washington, D.C. 20555

U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

Ginna Senior Resident Inspector

Cold Shutdown Justification

CS-10 (Revised)

Valves: 430, 431C

System: Reactor Coolant/Pressurizer P&ID: 33013-1258

Category: B, Active Class: 1

Function: These valves serve as the pressurizer power-operated relief valves (PORVs). Normally closed, these valves open to protect against excessive pressure surges.

Justification: Exercising these valves during power operation could cause unplanned pressure transients in the RCS resulting in a reactor trip. When the plant is in a cold shutdown condition, testing will be performed on a quarterly (92 day) basis. Testing will also be performed prior to reaching LTOP conditions when cooling down from power operations and it has been ⇒ 92 days + 25% since the last test.

Cold Shutdown Justification

CS-36 (Proposed)

Valves: 3506, 3507

System: Main Steam P&ID: 33013-1231

Category: B, ACTIVE Class: 2

Function: These valves serve as main steam inlet block valves to the atmospheric relief valves (ARVs 3410 and 3411) for both steam generators. These valves must close to isolate its respective ARV, if failed. These valves must open to permit emergency heat removal from the RCS through its respective ARV.

Justification: During power operation, these normally-open valves are exposed to steam generator steam pressure. These valves also have bypass valves installed around them. Although test connections are currently installed downstream of each set of inlet block valves and bypass valves, quarterly testing at power is impractical since this testing would require costly modifications to install test manifolds to minimize the potential for test personnel injury. This testing would require the manual operation of the associated ARV at power which creates the unnecessary potential for a reactor power excursion due to excessive heat removal. A safety hazard would always exist if periodic exercising of these valves under high pressure steam were performed due to the unknown potential for leakage past either the inlet or bypass valve.

Radiographic testing has been performed for valves 3506 and 3507 and proven to successfully demonstrate positive indication of disk position.

Exercising of these valves will be performed during cold shutdown employing radiographic testing of the valves in both the open and closed positions which provides positive indication of the required change of disk position per IWV-3412.