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 MECREY, R.C. Rochester Gas & Electric Corp.
 RECIP. NAME RECIPIENT AFFILIATION
 VISSING, G.S.

SUBJECT: Clarifies testing commitment made re insp rept 50-244/97-201
 & notifies that appropriate alternative to clarified testing
 commitment has been performed during current refueling
 outage.

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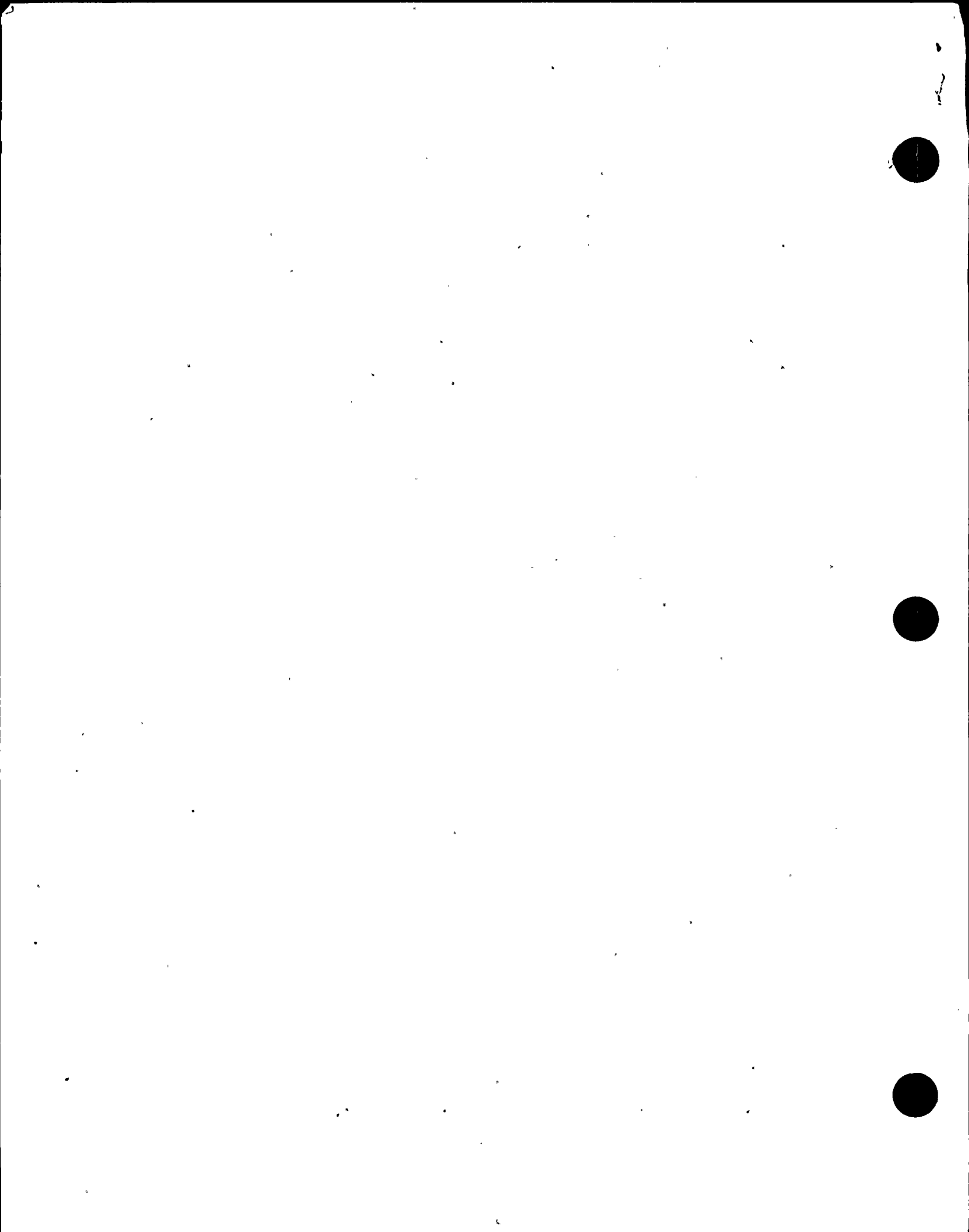
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ROBERT J. BLAKE
Vice President
November 3, 1997

November 3, 1997

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

Subject: Clarification of A/E Inspection Commitment
NRC Inspection Report No. 50-244/97-201
R. E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Vissing:

During the period from June 9 through August 15, 1997, the U.S. Nuclear Regulatory Commission (NRC), Office of Nuclear Reactor Regulation (NRR) performed an A/E Inspection of the R.E. Ginna Nuclear Power Plant. During this inspection, the NRC inferred that Rochester Gas & Electric (RG&E) had committed to performing seat leakage testing for two Component Cooling Water (CCW) System check valves. The intent of this correspondence is to clarify the testing commitment made by RG&E. Also, RG&E wishes to notify the NRC that an appropriate alternative to the clarified testing commitment has been performed during the current refueling outage.

Due to the short period of time from the receipt of NRC Inspection Report 50-244/97-201 to the projected completion of this refueling outage, RG&E believes it is prudent to notify the NRC of the check valve test clarification and proposed alternative now, rather than 60 days after issuance of the inspection report. As requested in the inspection report, RG&E will provide a schedule for completion of corrective actions, where applicable, within 60 days of issuance of the inspection report.

NRC Inspection Report No. 50-244/97-201, under Section E1 (Conduct of Engineering), Item E1.2.2.2(d) (CCW System Testing) states:

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"the licensee stated that valves 753A and B would be added to the in-service inspection program and require leak testing."

It is correct that check valves 753A and 753B will be added to the Ginna Station Inservice Testing Program, but with a test requirement of check valve closure verification testing and not seat leakage testing.

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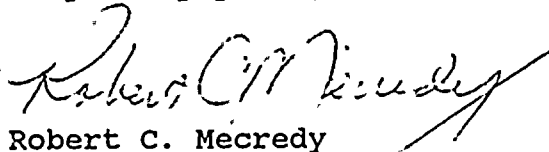
Check valves 753A and 753B are in the CCW System supply piping to the reactor coolant pump thermal barriers. Although these valves are designed as pressure class boundaries between the Reactor Coolant System and the lower pressure CCW System, they are not considered pressure isolation valves (PIVs) since, should a thermal barrier leak occur, the associated CCW piping is protected from overpressure by pressure relief valves and the Ginna Station licensing basis considers a thermal barrier leak as a small break loss of coolant accident.

Since the capacity of the associated pressure relief valves is sufficient to provide overpressure protection for the affected CCW System piping should a thermal barrier leak occur, the safety function of check valves 753A and 753B is to close to mitigate the consequences of the accident. Thus, seat leakage in the closed position is inconsequential.

Therefore, RG&E agrees that it is prudent to subject check valves 753A and 753B to periodic inservice testing to verify closure capability. In order to perform closure verification testing, a modification is required to install suitable test connections. Due to the short amount of time from when the commitment for inservice testing was made prior to the commencement of the current refueling outage, the proper preparations were not able to be made to perform this required modification. However, RG&E has disassembled check valves 753A and 753B during this refueling outage to verify valve obturator movement to the closed position in accordance with OMA-1988, Part 10, Section 4.3.2.4. This activity is an acceptable alternative pursuant to Position 2 of NRC Generic Letter 89-04 and, as such, does not require a request for relief from Code requirements.

RG&E intends to modify the affected piping system to install suitable test connections during the Spring, 1999 refueling outage and to commence the periodic closure verification testing schedule in accordance with the Ginna Station Inservice Testing Program at that time.

Very truly yours,


Robert C. Mecredy

GJW\482

xc: Mr. Guy S. Vissing (Mail Stop 14B2)
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