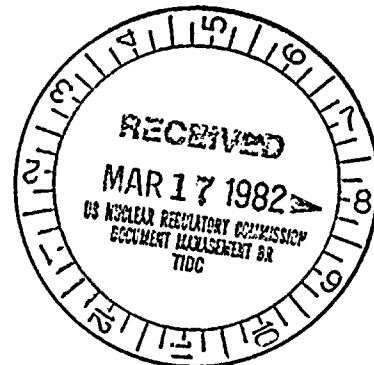




UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

March 9, 1982

Docket No. 50-244  
LS05-82-03-055



Mr. John E. Maier, Vice President  
Electric and Steam Production  
Rochester Gas & Electric Corporation  
89 East Avenue  
Rochester, New York 14649

Dear Mr. Maier:

SUBJECT: SEP TOPIC VI-7.B, ESF SWITCHOVER FROM INJECTION TO  
RECIRCULATION MODE (AUTOMATIC ECCS REALIGNMENT)

By letter dated December 31, 1981, we forwarded to you our draft evaluation of SEP Topic VI-7.B, "ESF Switchover from Injection to Recirculation Mode (Automatic ECCS Realignment)." Your response dated February 16, 1982, stated that you disagreed with our assessment especially for the evaluation of time required for shutoff of operating pumps at the Refueling Water Storage Tank (RWST) at the 10% level and the time required for ESF switchover after the pumps are shutoff.

Your analysis of switchover from injection to recirculation following a LOCA is deficient in two areas:

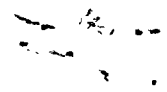
The first is the timing of pump switchoff following the 10% low-low RWST level alarm. The analysis presented did not account for instrument and alarm setpoint errors. Unless otherwise justified, we consider an overall error of 3% of full instrument span the minimum acceptable value. In addition, the analysis did not provide justification for the pump flow rates used in the calculation. We would like to see supporting experimental evidence to confirm that the flowrates used in the analysis are conservative.

The second area of concern is the boildown analysis of the vessel water level following ECCS pump shutoff. During this time the core is not fed with cooling water until ECCS flow is restarted. We need justification of the values used for the initial conditions of the core, including water temperature, void fraction flow paths, and other pertinent data.

*5E04  
1/1  
DSU use (07)  
Add:  
G. Staley*

We believe the model used may not be sufficiently detailed to accurately predict vessel water level for different break locations. The effects of steam flow displacing water out of the core and break during boiloff, as well as steam backpressure were not considered. Therefore, we do not feel that you have provided sufficient justification to resolve our concerns and we consider the December 31, 1981 evaluation to be

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This evaluation will be a basic input to the integrated safety assessment for your facility. The assessment maybe revised in the future if your facility design is changed or if the NRC criteria relating to this subject is modified before the integrated assessment is complete.

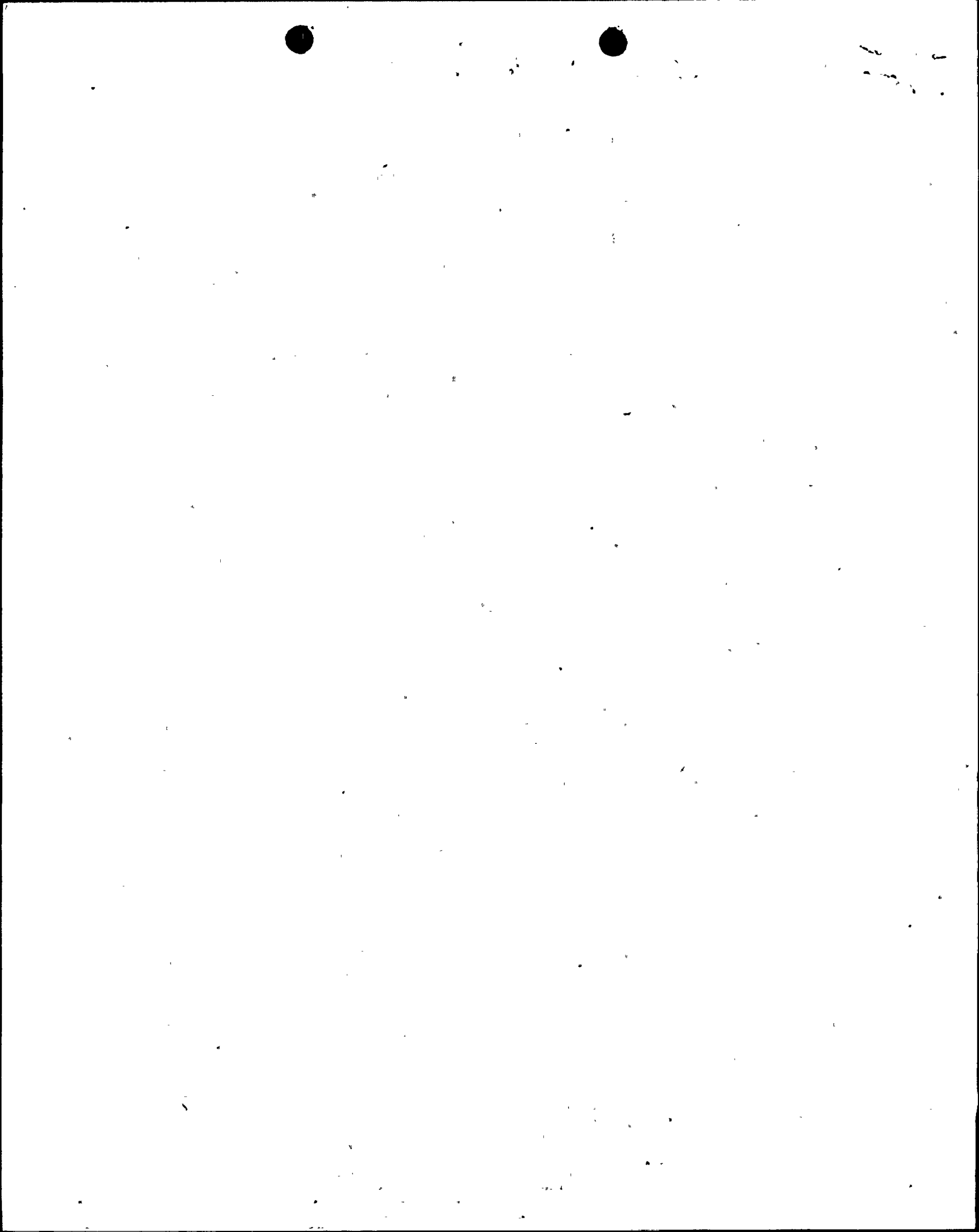
Sincerely,

Dennis M. Crutchfield, Chief  
Operating Reactors Branch No. 5  
Division of Licensing

cc: See next page

OFFICE ▶	SEP B:DL	SEP B:DL	SEP B:DL	ORB#5:PM	ORB#5:BC	AD SA:DL	
SURNAME ▶	AWang:dk	GWainas	WRussell	JLyons	DCrutchfield	GLainas	
DATE ▶	3/5/82	3/5/82	3/5/82	3/8/82	3/8/82	3/8/82	

3/9/82



Mr. John E. Maier

cc

Harry H. Voigt, Esquire  
LeBoeuf, Lamb, Leiby and MacRae  
1333 New Hampshire Avenue, N. W.  
Suite 1100  
Washington, D. C. 20036

Mr. Michael Slade  
12 Trailwood Circle  
Rochester, New York 14618

Ezra Bialik  
Assistant Attorney General  
Environmental Protection Bureau  
New York State Department of Law  
2 World Trade Center  
New York, New York 10047

Resident Inspector  
R. E. Ginna Plant  
c/o U. S. NRC  
1503 Lake Road  
Ontario, New York 14519

Director, Bureau of Nuclear  
Operations  
State of New York Energy Office  
Agency Building 2  
Empire State Plaza  
Albany, New York 12223

Rochester Public Library  
115 South Avenue  
Rochester, New York 14604

Supervisor of the Town  
of Ontario  
107 Ridge Road West  
Ontario, New York 14519

Dr. Emmeth A. Luebke  
Atomic Safety and Licensing Board  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555.

Dr. Richard F. Cole  
Atomic Safety and Licensing Board  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

U. S. Environmental Protection Agency  
Region II Office  
ATTN: Regional Radiation Representative  
26 Federal Plaza  
New York, New York 10007

Herbert Grossman, Esq., Chairman  
Atomic Safety and Licensing Board  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Ronald C. Haynes, Regional Administrator  
Nuclear Regulatory Commission, Region I  
Office of Inspection and Enforcement  
631 Park Avenue  
King of Prussia, Pennsylvania 19406