ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:9111060399 DOC.DATE: 91/10/29 NOTARIZED: NO DOCKET #
FACIL:50-244 Robert Emmet Ginna Nuclear Plant, Unit 1, Rochester G 05000244
AUTH.NAME AUTHOR AFFILIATION
MECREDY,R.C. Rochester Gas & Electric Corp.
RECIP.NAME RECIPIENT AFFILIATION
JOHNSON,A.R. Project Directorate I-3 See Rpt.

SUBJECT: Forwards Rev 1 to QA Manual,App C, "Inservice Pump & Valve Testing Program for 1990-1999 Interval," incorporating cold shutdown justifications & relief requests,per Generic Ltr 89-04.

DISTRIBUTION CODE: A047D COPIES RECEIVED:LTR 1 ENCL 1 SIZE: 16+176
TITLE: OR Submittal: Inservice Inspection/Testing/Relief from ASME Code

NOTES:License Exp date in accordance with 10CFR2,2.109(9/19/72). 05000244

	RECIPIENT ID CODE/NAME	COPIES LTTR	COPIES ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR	COPIES ENCL
	PD1-3 LA	1	0	PD1-3 PD	1	1
	JOHNSON,A	2	2			
INTERNAL:	NRR/DET/ECMB 9H	1	1	NRR/DET/EMEB 7E	1	1
	NUDOCS-ABSTRACT	1	1	OC/LFMB	1	0
	OGC/HDS1	1	0	REG FILE 01	1	1
	RES/DSIR/EIB	1	1			
EXTERNAL:	EG&G BROWN,B	1	1	EG&G RANSOME,C	1	1
	NRC PDR	1	1	NSIC	1	1

Cert NO
P8457311 24

RIDS/ADDS

RIDS/ADDS

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK, ROOM P1-37 (EXT. 20079) TO ELIMINATE YOUR NAME FROM DISTRIBUTION LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 15 ENCL 12

MAT

ROCHESTER GAS AND ELECTRIC CORPORATION ○ 89 EAST AVENUE, ROCHESTER N.Y. 14649-0001

ROBERT C. MECREDY
Vice President
Ginna Nuclear Production

TELEPHONE
AREA CODE 716 546-2700

October 29, 1991

U.S. Nuclear Regulatory Commission
Document Control Desk
Attn: Allen R. Johnson
Project Directorate I-3
Washington, D.C. 20555

Subject: Inservice Testing (IST) Program for Pumps and Valves
1990 - 1999 Third 10-Year Interval, Revision 1
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Johnson:

The purpose of this letter is to update the status and request approval of the Rochester Gas & Electric (RG&E) Corporation IST Program for pumps and valves at the R.E. Ginna Nuclear Power Plant. This submittal is made in accordance with the recommendations delineated in NRC Generic Letter 89-04.

By letter dated April 15, 1991, the Safety Evaluation (SE) for the IST Program, third 10-year interval, at the R.E. Ginna Nuclear Power Plant was issued by the Nuclear Regulatory Commission. Rochester Gas & Electric Corporation has reviewed the SE and its attached Technical Evaluation Report (TER) and is in the process of resolving those nineteen unresolved items identified in Appendix A of the TER as program anomalies. The SE requested anomalies 4, 6, 7, 10, 14, and 15 be resolved within the longer of either one (1) year or the next refueling outage and the remaining anomalies resolved within six (6) months of RG&Es receipt of the SE. Seven of the nineteen program anomalies have been addressed and our resolution is contained in attachment 2. Two relief requests (anomalies 6 and 9) have been withdrawn. NRC concurrence of these resolved items is requested.

In addition, RG&E is continuing to upgrade the IST Program based on test experience, plant modifications and changes in program administration. This correspondence details the changes in the current RG&E program. All of the changes presented herein are in compliance with either ASME Section XI and OM Codes or the guidance established in Generic Letter 89-04. As changes are proposed to the IST Program, the NRC will be informed of such changes as noted in the April 15, 1991 letter.

The following attachments are enclosed to document the status of the R. E. Ginna Nuclear Power Plant IST Program for pumps and

A047 1/1 Cert No P645731124

valves:

Attachment 1	Summary of Changes to the IST Program
Attachment 2	Status of IST Program Anomalies
Attachment 3	Revision 1 to Appendix C of the Ginna Station Quality Assurance Manual.

Ten of the nineteen IST Program anomalies remain unresolved by RG&E (items 4,7,10,11,13,14,15,17,18,19) as documented in Attachment 2 to this letter. These will be resolved and addressed in a future correspondence.

It is requested that the time period for resolution of items 11, 13, 17, 18, and 19 be extended from 6 to 12 months, due to the necessity to evaluate new test methodology and plant modification feasibility.

Very truly yours,

Robert C. Mecredy

KAM/182
Attachments

xc: Mr. Allen R. Johnson (Mail Stop 14D1)
Project Directorate I-3
Washington, D.C. 20555

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

Ginna Senior Resident Inspector

ATTACHMENT 1

Summary of Changes to the IST Program

Note: All changes are reflected in Revision 1 to Appendix C of the Ginna Station Quality Assurance Manual (Attachment 3 to this letter).

1) Addition of Components, Notes or Test Requirements

Valves	Changes
4620B	Added to Remarks that this valve is a Manually Operated MOV.
4758	Added to Remarks that leak test is performed "In Lieu of LT-J" since this note was inadvertently omitted.
8418	Changed from passive to active and added tests EX Q, ST-C Q and FS-C Q due to FSAR change for this containment isolation valve.
9627A	Added to Remarks that this is a Sample Disassembly.
9627B	Added to Remarks that this is a Sample Disassembly.

2) Typographical Errors

Text Section	Changes
2.2	Changed Parts 1, 10 for OMa-1988 to Parts 6 and 10.
6.3.12	Changed OMa-1988 to OM-1987.

Valve	
1713	Changed P&ID from 1272-3 to 1272-2.
3508	Changed test frequency from 10Y to 5Y.
3509	Changed test frequency from 10Y to 5Y.
3510	Changed test frequency from 10Y to 5Y.
3511	Changed test frequency from 10Y to 5Y.
3512	Changed test frequency from 10Y to 5Y.
3513	Changed test frequency from 10Y to 5Y.
3514	Changed test frequency from 10Y to 5Y.
3515	Changed test frequency from 10Y to 5Y.
5907	Changed fail position from FS-0 to FS-C.
5907A	Changed fail position from FS-C to FS-0.
5908	Changed fail position from FS-0 to FS-C.
5908A	Changed fail position from FS-C to FS-0.
9701A	Changed valve type from GTV to GLV.

3) Specific NRC Generic Letter 89-04

Text Section	Changes
2.10	Added reference to Minutes of Public Meeting on GL 89-04.
4.1	Added ASME/ANSI OM Code, NRC GL 89-04 and the Minutes of Public Meetings on GL 89-04 as sources of this program.

4) Modifications

Valves	Changes
515	Valve type changed from globe to gate per modification by EWR 3755.
516	Valve type changed from globe to gate per modification by EWR 3755.
697A/B	Changed relief request for CV-P-CS and CV-O-R from VR-20 to VR-29 since after the addition of the RHR mini-flow recirculation piping by EWR 4675, VR-20 no longer applies.
4023	Deleted CV-P-Q, changed CV-O-R to CV-O-Q and deleted VR-23 due to the installation of flow instrumentation by EWR 4755.
5941A/B	Changed CV-C-R to CV-C-Q and deleted VR-25 due installation of test connections by EWR 3596.
8655	Deleted CV-P-Q, changed CV-O-R to CV-O-Q and deleted VR-28 due to installation of flow instrumentation by EWR 4755.

5) Resolution of Action Items

Valve	Changes
842A/B	Changed frequency for CV-O, C from 10Y to 6Y per NRC review.
853A/B	Changed CS-16 to VR-3 and deleted CS-16 since CS-16 duplicated VR-3.
867A/B	Changed frequency for CV-O, C from 10Y to 6Y per NRC review.
3992	Deleted CS-5 since it duplicated VR-21.
3993	Deleted CS-5 since it duplicated VR-21.
4023	Deleted CV-C-R since it does not perform a closed safety function per NRC review.

CSJ

CS-10	Clarified testing frequency concern for PORVs per NRC review.

RR

VR-21	Added statement from CS-5 to ensure duplication is maintained with CS-5.

6) Changes as a Result of Test Implementation

Pump	Changes
PCH01A/B/C	Changed measured parameters for positive-displacement pumps and added PR-9.

Valve

697A/B	Changed CV-C-CS to CV-C-Q since new test methodology permits this testing.

7) Clarifications/Upgrades

Text Section	Changes
2.3	Added OM-1987, Part 1 as a reference.
4.1.1	Clarified the duties of the ANII with regards to IST program.
5.4.e	Added SSC for safety significant classification.
6.4.g	Added SSC for safety significant classification.
8.0	Revised P&ID for Construction Fire Service Water per P&ID upgrade.
Table of Acronyms	Added SSC for safety significant classification.

Pump

PAF03	Changed ID from PFW04 per P&ID Upgrade
PAF01A	Changed ID from PFW02A per P&ID Upgrade
PAF01B	Changed ID from PFW02B per P&ID Upgrade
PSF01A	Changed ID from PFW03A per P&ID Upgrade
PSF01B	Changed ID from PFW03B per P&ID Upgrade
PAC07A	Changed Safety Class from 3 to SSC

Valve	
14	Changed valve size, safety class and ID from 014 per P&ID Upgrade and changed PIT-Q to PIT-R to reflect proper frequency.
17	Changed ID from 0017 per P&ID Upgrade and added PIT-R since this test is performed as part of the program.
270A/B	Changed safety class from 1 to 2 per P&ID Upgrade.
310	Changed safety class from 2 to 1 per P&ID Upgrade.
370B	Changed safety class from 2 to 1 per P&ID Upgrade.
386	Changes safety class from 1 to 2 per P&ID Upgrade.
392A	Changed safety class from 2 to 1 per P&ID Upgrade.
528	Changed valve size per P&ID Upgrade.
590	Changed valve size per P&ID Upgrade.
591	Changed valve size per P&ID Upgrade.
592	Changed valve size per P&ID Upgrade.
593	Changed valve size per P&ID Upgrade.
651	Changed ID from BAC01 per P&ID Upgrade.
700	Changed valve size per P&ID Upgrade.
701	Changed valve size per P&ID Upgrade.
704A/B	Changed valve size per P&ID Upgrade.
720	Changed valve size per P&ID Upgrade.
721	Changed valve size per P&ID Upgrade.
723A/B	Changed P&ID coordinates per P&ID Upgrade.
814	Changed P&ID coordinate per P&ID Upgrade.
844A/B	Changed valve size per P&ID Upgrade.
845C	Changed ID from BSI03, valve size and safety class per P&ID Upgrade.
845D	Changed ID from BSI04, valve size and safety class per P&ID Upgrade.
852B	Changed P&ID coordinate per P&ID Upgrade.
856	Changed P&ID coordinate per P&ID Upgrade.
857A/B/C	Changed valve size per P&ID Upgrade.
955	Changed valve size per P&ID Upgrade.
1802	Changed safety class from 2 to 3 per P&ID Upgrade.
2850	Changed ID from BSI01 per P&ID Upgrade.
2851	Changed ID from BSI02 per P&ID Upgrade.
3518	Changed safety class from NC to SSC per Q-List.
3519	Changed safety class from NC to SSC per Q-List.
4269	Changed safety class from NC to SSC per Q-List.
4270	Changed safety class from NC to SSC per Q-List.

Valve

4271	Changed safety class from NC to SSC per Q-List.
4272	Changed safety class from NC to SSC per Q-List.
4609	Changed valve type and size per P&ID Upgrade.
4636	Changed valve type per P&ID Upgrade.
5129	Changed P&ID and coordinate per P&ID Upgrade.
5133	Changed safety class from NC to SSC per Q-List.
5134	Changed safety class from NC to SSC per Q-List.
5136	Changed safety class from NC to SSC per Q-List.
5171	Changed safety class from NC to SSC per Q-List.
5393	Changed P&ID coordinate per P&ID Upgrade.
5733	Changed valve type per P&ID Upgrade.
5734	Changed valve type per P&ID Upgrade.
8655	Changed safety class from 3 to SSC per Q-List.
9634B	Changed valve size per P&ID Upgrade.
10205S1	Changed safety class from NC to 2 per P&ID Upgrade.
10209S1	Changed safety class from NC to 2 per P&ID Upgrade.
10211S1	Changed safety class from NC to 2 per P&ID Upgrade.
10213S1	Changed safety class from NC to 2 per P&ID Upgrade.
10214S1	Changed safety class from NC to 2 per P&ID Upgrade.
10215S1	Changed safety class from NC to 2 per P&ID Upgrade.

8) Deletions

Valve

4627	Deleted LT-X-R and remark since this test was incorrectly included.
4628	Deleted LT-X-R and remark since this test was incorrectly included.
4635	Deleted LT-X-R and remark since this test was incorrectly included.
4641	Deleted LT-X-R and remark since this test was incorrectly included.
4642	Deleted LT-X-R and remark since this test was incorrectly included.

Valve	
4757	Deleted LT-X-R and remark since this test was incorrectly included.
8685	Deleted from program since its basis for inclusion was that all passive valves with remote indication would have a PIT performed; this valve is a manual valve with no remote indication.
8689	Deleted from program since its basis for inclusion was that all passive valves with remote indication would have a PIT performed; this valve is a manual valve with no remote indication.

ATTACHMENT 2

Revision 0
September 27, 1991

Note: Anomalies are paraphrased from that of Appendix A to the TER.

Status of IST Program Anomalies

Anomaly	Resolution	Date/Rev.
1. Relief requested (PR-6) from instrument full-scale range requirements and to use vibration detectors with multiple overlapping scales for IST of safety-related pumps.	The accuracy of the vibration instruments employing multiple overlapping scales used for IST of safety-related pumps is equivalent to that provided by a single scale instrument that complies with the requirements of IWP-4110 and 4120.	9-27-91/0
2. Relief requested (PR-2) from the flow rate measurement requirements for the diesel generator fuel oil transfer pumps (PDG02A and B) and to determine pump flow rate by measuring change in day tank level versus time.	The IST of the diesel generator fuel oil transfer pumps (PDG02A and B) involving the determination of pump flow rate by measuring the change in day tank level versus time complies with the Allowable Ranges and Corrective Action requirements specified in IWP-3200.	9-27-91/0
3. Relief requested (PR-7) from the flow rate measurement requirements for the service water pumps (PSW01A, 1B, 1C and 1D) and to measure the flow rate in the containment fan cooler outlet lines.	The measurement of the IST flow rate for the service water pumps (PSW01A, 1B, 1C and 1D) employing flow instrumentation for the containment fan cooler outlet lines has been established as a repeatable test condition providing valid data for detecting pump degradation. Test results are trended and evaluated for indication of degradation.	9-27-91/0

Anomaly	Resolution	Date/Rev.
4. Relief requested (GR-6) from the stroke time measurement requirements for hand control valves which operate using a variable set air signal and to quarterly exercise but not measure the stroke time for these valves.	Resolution options are being evaluated.	
5. Relief requested GR-7) from stroke time evaluation and corrective action requirements and to follow a plan based on deviation from a reference stroke time instead of previous stroke time.	The stroke time evaluation and corrective action plan based on deviation from a reference stroke time agrees with the criteria of GL 89-04, Attachment 1, Position 6.	9-27-91/0
6. Relief requested (VR-25) from the exercising frequency and test method requirements for the emergency diesel generator air start accumulator check valves 5941A and 5942A.	Withdrawn- Reverse flow closure testing of emergency diesel generator air start accumulator check valve 5941A and 5942A will be performed in accordance with PT12.7 as a result of the completion of a piping modification under EWR 3596.	9-27-91/0

Anomaly	Resolution	Date/Rev.
7. Relief requested (VR-13) from the stroke time measurement requirements for the isolation valves in the auxiliary feedwater and standby auxiliary feedwater pump recirculation lines, 4291, 4304, 4310, 9710A and 9710B and to exercise but not measure stroke time. Licensee should develop an adequate means of monitoring valve degradation.	Resolution options are being evaluated.	
8. Relief requested (VRs 5 & 17) from the exercising requirements for 9627A, 9627B, 4601, 4602, 4603 and 4604 and to partially exercise quarterly and to disassemble and manually full-stroke exercise on a sampling basis during refueling outages.	After disassembly and inspection of 9627A, 9627B, 4601, 4602, 4603, and 4604, on a sampling basis a partial flow test of the affected valve is performed per PTs-36Q or 2.7 before returning the valve to service. As part of the Reliability Centered Maintenance Program, RG&E is actively pursuing non-intrusive diagnostic technology which will be employed for the IST Program.	9-27-91/0
9. Relief requested (VR-23) from the exercising requirements for 4023, TDAFW recirculation check valve and to verify full-stroke capability by disassembly and inspection each refueling outage.	<u>Withdrawn</u> - Full-stroke open exercising of 4023 will be performed per PT-16Q-T as a result of the installation of flow instrumentation under EWR 4755.	9-27-91/0

Anomaly	Resolution	Date/Rev.
10. Relief requested (VR-6) from the stroke time measurement requirements for 4324, 4325 and 4326, solenoid operated valves in the service water lines to the AFW pump bearings and to exercise quarterly but not measure stroke time. Licensee should develop an adequate means of monitoring valve degradation.	Resolution options are being evaluated.	
11. Relief requested (VR-7) from the remote position indication verification requirements for 434 and 435, the pressurizer safety relief valves and to verify valve remote position indication during refueling outages by simulating valve actuation by moving the valve's coil. Granted, if valve position indication is verified to accurately reflect obturator position during the valve setpoint testing.	Resolution options are being evaluated.	

Anomaly	Resolution	Date/Rev.
12. Relief requested (VRs 8 & 9) from the exercising requirements for 842A, 842B, 867A and 867B, the accumulator discharge check valves and combined accumulator/ safety injection pump check valves and to partially stroke exercise quarterly and disassemble and inspect to verify full-stroke capability once every 10 years.	Disassembly of 842A, 842B, 867A and 867B shall occur so that the interval between examining each valve is not longer than once every 6 years. Once a non-intrusive diagnostic methodology is incorporated by RG&E, it will be employed while performing a reduced flow test each refueling outage.	9-27-91/0
13. Relief requested (VR-24) from the exercising requirements for 862A and 862B and proposed to exercise these valves quarterly using a mechanical exerciser and measuring the breakaway force and comparing this force to a reference value when the valve is known to be in good condition. Licensee must also continue to measure the running force required to exercise these valves to their fully open position.	Resolution options are being evaluated.	

Anomaly	Resolution	Date/Rev.
14. Relief requested (VR-18) from the stroke time measurement requirements for 5907, 5907A, 5908 and 5908A and to verify proper valve operability by observing their operation during quarterly diesel testing without measuring stroke time. Licensee should develop a method to monitor for valve degradation.	Resolution options are being evaluated.	
15. Relief requested (VR-2) from the exercising requirements for 5960A and 5960B, check valves in the diesel day tank overflow lines to the storage tanks and to disassemble and inspect during refueling outages without partial flow test after reassembly. Licensee should be able to adequately test these valves or take other actions.	Resolution options are being evaluated.	
16. Cold shutdown justifications CS-5, CS-16 and CS-30 identify test frequencies other than during cold shutdowns. Since the affected valves are included in relief requests VR-21, VR-3, VR-14 and VR-20, delete CS-5, CS-16 and CS-30.	Cold shutdown justifications CS-5 and CS-16 have been deleted from Revision 1 to Appendix C to the Quality Assurance Manual. CS-30 has not been deleted since relief requests VR-20 no longer applies to 697A and 697B due to the installation of the RHR mini-flow recirculation piping under EWR 4675.	9-27-91/0

Anomaly	Resolution	Date/Rev.
17. The licensee has not provided adequate technical basis in cold shutdown justification CS-12 to demonstrate the impracticality of quarterly exercising 813 and 814. Licensee states exercising these valves could result in thermal stress to the reactor vessel supports. Licensee must exercise quarterly or revise the cold shutdown justification.	Resolution options are being evaluated.	
18. Cold shutdown justification CS-20 states that 8419 is normally closed during power operation and is not required to change position to perform its safety function. 8419 is listed as an Active Category A/C valve in program. If 8419 were open during power operations it would have to change position. 8419 should be exercised quarterly.	Resolution options are being evaluated.	

Anomaly	Resolution	Date/Rev.
19. Cold shutdown justification CS-29 states that 9227 and 9229 are normally closed during power operation and are not required to change position to perform their safety function. 9227 is listed as an Active Category A valve and 9229 is listed as an Active Category A/C valve. If 9227 or 9229 were open during power operation they would have to change position. 9227 and 9229 should be exercised quarterly.	Resolution options are being evaluated.	