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March 14, 1990

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

Subject: Inservice Testing Program Status and Relief Request
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Johnson:

This correspondence is in response to the issues discussed during the conference call between RG&E, the NRC and EG&G on March 7, 1990. The comments concerning the Third Interval Inservice Test Program submittal are addressed as follows:

1. Examples of adverse effects due to securing nitrogen, instrument air, and service air for an extended period as stated in GR-3 would be loss of primary pressure control due to loss of pressurizer spray and reactor coolant pump seal water. Also, safety would be jeopardized due to the loss of low pressure overpressure protection and nitrogen to SI accumulators and pressurizer relief tank. Refueling operation would be hindered by loss of refueling crane control.

2. The safety function performed by valves 5960A and 5960B referred to in VR-2 is to provide overpressure protection for the fuel oil day tank. Disassembly will be performed to verify forward flow.

3. It is extremely impractical to exercise Valves 9627A and 9627B referred to in VR-5 because it would contaminate the Standby Auxiliary Feedwater System with service water. Flushing and verification activities that would be necessary to restore the Standby Auxiliary Feedwater System to its required cleanliness is time-consuming and may not be completely effective. Furthermore, the secondary chemistry consequences are very severe should the Standby Auxiliary Feedwater System actuate with service water in the lines.

4. There has been no demonstration that any currently available diagnostic testing for rapid acting Valves 5907, 5907A, 5908 and 5908A referred to in VR-18 would provide useful trending information. VR-18 is requested to be approved as submitted. Note that the Ginna valves are tested on a frequent (monthly) periodic basis.

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5. It is not desirable to disable the Low Temperature Overpressure Protection System for an extended period as would be required to test Check Valves 8606A and 8606B referred to in VR-19, particularly at cold shutdown when this system performs its safety function. Testing will be performed during refueling as submitted.

6. VR-22 submitted for SI Accumulator Isolation Valves 841 and 865 will be deleted and a cold shutdown justification initiated in its place.

7. The close safety function for Valve 4023 referred to in VR-23 will be deleted.

RG&E continues to be an active participant in nuclear test code committees (ASME, ANS) and related generic concerns such as service water system and check valve testing (NIC). Should viable alternative diagnostic test methods emerge, application of these methods at Ginna would be evaluated for possible IST Program inclusion.

Attached are copies of PR-8 and VR-25 that were inadvertently omitted from the submittal. Copies of the revised relief requests and cold shutdown justification discussed in this correspondence will be forwarded upon completion.

Very truly yours,

Robert C. Mecredy
Division Manager
Nuclear Production

GJW\090
Attachment

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

RELIEF REQUEST NO. PR-8

SYSTEM:	Residual Heat Removal (RHR)
PUMPS:	Residual Heat Removal Pumps (ACAPRH 1,2)
SAFETY CLASS:	2
FUNCTION:	Supply safety injection flow to the reactor vessel.
TEST REQUIREMENT:	The resistance of the system shall be varied until either the measured differential pressure or the measured flow rate equals the corresponding reference value (IWP-3100).
BASIS FOR RELIEF:	During power operation RHR pumps can only be tested utilizing minimum-flow return lines. These lines have flow orifices installed and do not allow throttling to an established reference value for either flow or pressure
ALTERNATE TESTING:	These pumps shall be tested quarterly measuring observed flow, differential pressure and vibration. The pumps shall be tested using the normal flow path during cold shutdowns and refueling outages. Data from both test frequencies shall be trended as required by IWP-6000. (re, Generic Letter89-04, Attachment 1 Position 9)

RELIEF REQUEST NO. VR-25

SYSTEM:	Emergency Diesel Generator Starting Air
VALVES	5941A, 5942A
CATEGORY:	C
SAFETY CLASS:	3
FUNCTION:	These check valves open to allow air flow into the starting air accumulators. These valves close to prevent depressurization of the accumulators.
TEST REQUIREMENT:	Check valves shall be exercised at least once every three months, except as provided by IWV-3522. (IWV-3521)
BASIS FOR RELIEF:	During operation there is no practical means to exercise these valves. Valve closure cannot be verified due to system design. To perform a closure verification would require disassembly of mechanical joints in the piping, which would place the diesel in an inoperable condition.
ALTERNATE TESTING:	One valve will be disassembled, full stroke exercised and inspected each refueling outage on a rotating basis. If that valve fails, the remaining valve will be disassembled, full stroke exercised and inspected during that same outage. (re, Generic Letter 89-04, Attachment 1 - Position 2)