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Vice President  
Nuclear Operations

November 24, 1999

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

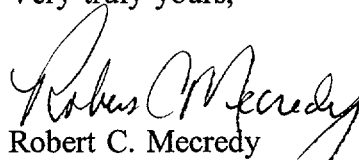
Dear Mr. Vissing:

Enclosed is the Ginna Station Fourth Interval Inservice Testing (IST) Program, along with the associated Relief Requests, Cold Shutdown Justifications, and Refueling Outage Justifications. This program was developed in accordance with Section XI of the 1989 ASME Code, per 10 CFR50.55a(b)(2). This Fourth Interval begins on January 1, 2000 and extends to December 31, 2009. A summary of changes is also included to help focus NRC review of program differences.

By using the 1989 ASME Code as the Code of Record, and developing new test methods, Ginna Station has reduced the number of relief requests from 52 to 15. These 15 remaining relief requests are consistent with relief requests previously approved for the Third Interval IST Program. A detailed explanation for the remaining relief requests is attached.

We request approval of these 15 relief requests by March 15, 2000.

Very truly yours,



Robert C. Mecredy

GJW/546  
Attachment

xc: Mr. Guy S. Vissing (Mail Stop 8C2)  
Project Directorate I  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

A047

Regional Administrator, Region I  
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475 Allendale Road  
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U.S. NRC Ginna Senior Resident Inspector

Summary of Changes  
Inservice Testing Program Document  
4<sup>th</sup> Ten-Year Interval  
Revision 0

<u>Section</u>	<u>Change</u>
Table of Contents	Added sections for Refueling Outage Justifications and Technical Justifications per the recommendations of NUREG 1482
1.1	Changed IST Program regulatory basis documents to 1989 ASME Section XI and OM Codes.
1.3	Added statement that Ginna is licensed for safe shutdown to the hot shutdown condition.
2.1	Changed ASME Section XI reference from 1986 edition to 1989 edition.
6.2	Deleted thermal relief valve exemption.
9.0	Reformatted cold shutdown justifications to organize by systems. Total number of CSJs changed from 38 to 31.
10.0	New section for refueling outage justifications per the recommendation of NUREG 1482. Total number of ROJs is 9.
11.0	Reformatted relief requests. Original Code relief CR-1 deleted. Generic relief requests volume is reduced from 7 to 2. New GR-2 is stroke time methodology request for relief. Pump relief requests reduced from 12 to 1. Valves relief requests reduced from 32 to 12.  Relief request cross-matrix is attached showing changes from 3 <sup>rd</sup> to 4 <sup>th</sup> intervals.
Attach. A	Deleted pump testing inlet pressure and bearing temperature requirements.
Attach. A	Charging pumps inclusion in IST Program is changed to administratively added (*) due to charging pumps are credited only to achieve cold shutdown while safe shutdown for Ginna is the hot shutdown condition.
Attach. B	Administratively added (*) service water valves 4622 and 8689 (SFP HXs outlets) with manual exercise test requirement once every 3 refueling outages based on NRC IST Program inspection finding.

Section

Change

Attach. B Added spent fuel pool cooling water valves 8657 and 8663 (SFP HX B inlet and outlet) based on NRC IST Program inspection finding.

Attach. B Added CV-O for 8606A/B.

Attach. B Added the following SWS relief valves:

4655	4660	4759	4770B
4656	4717	4770	4770F
4658	4718	4770A	4770G
4659			8681

Attach. B Added the following CCW relief valves:

740A	755A	770	774C
740B	755B	774A	774D
744	766	774B	776
			818

Attach. B Added the following diesel generator fuel oil and lube oil relief valves:

5923	5925	5989
5924	5926	5990

Attach. B Added the following TDAFW pump lube oil relief valves:

5490J  
5490N

Attach. B Changed 951, 953 and 955, primary sampling AOVs, to administratively added (\*) since these valves have no containment isolation or pressure isolation safety functions.

Attach. B Changed 4304, 4310, 4291, 9710A and 9710B, recirculation AOVs for the motor-driven, turbine-driven and standby auxiliary feedwater pumps respectively, to administratively added (\*) since these valves have no credited safety function.

Inservice Testing Program Relief Request Changes  
3<sup>rd</sup> Interval to 4<sup>th</sup> Interval  
R.E. Ginna Nuclear Power Plant

3 <sup>rd</sup> Interval Relief Request	4 <sup>th</sup> Interval Document	Changes
CR-1	None	Deleted - (ANII administrative duties)
PR-1	None	Deleted - (Pump bearing temperature measurement)
PR-2	PR-1	No changes/previously approved - EDG fuel oil transfer pump flow rate measurement
PR-3	None	Deleted - (CS/SI pumps inlet pressure)
PR-4	None	Deleted - (SW pumps inlet pressure)
PR-5	None	Deleted - (SW pumps vibration measurement)
PR-6	None	Deleted - (Test instrumentation scales)
PR-7	None	Previously deleted during 3 <sup>rd</sup> interval - (SW pump flow rate)
PR-8	TJ-1	Justification for RHR pump reference flow rate tolerance (relief is not required per NUREG 1482, Para. 5.3)
PR-9	None	Deleted - (Charging pumps discharge pressure)
PR-10	None	Deleted - (EDG Fuel oil transfer pumps discharge pressure)
PR-11	None	Deleted - (Pump vibration measurements, velocity vs. displacement)
PR-12	None	Deleted - (SW pumps flow rate measurements using ultrasonic flowmeter)
GR-1	None	Deleted - (MOV and AOV partial exercising)
GR-2	None	Deleted - (Appendix J isolation valves leak rate testing)
GR-3	ROJ-10	Reformatted as a refueling outage justification for instrument air check valve 5393
GR-4	None	Deleted - (Trending of rapid acting valves)

3 <sup>rd</sup> Interval Relief Request	4 <sup>th</sup> Interval Document	Changes
GR-5	GR-1	None - RCPB isolation valves leak rate testing
GR-6	None	Previously deleted during 3 <sup>rd</sup> interval - (Hand control valve stroke timing)
GR-7	GR-2	Rewritten for stroke time results analysis methodology
VR-1	TJ-2	Skid mounted SOVs in EDG Air Start System, 5933A/B, 5934A/B
VR-2	VR-1	Previously approved for check valve sample disassembly of 5960A/B
VR-3	CS-10	Reformatted as a cold shutdown justification for RHR check valves 853A/B
VR-4	ROJ-4	Reformatted as a refueling outage justification for RHR check valve 854
VR-5	VR-2	Previously approved for check valve sample disassembly of 9627A/B
VR-6	VR-3	Previously approved for relief from stroke time testing of SOVs 4324, 4325 and 4326
VR-7	VR-4	Previously approved for position indication verification for Przr safeties 434 and 435
VR-8	VR-5	Previously approved for full flow testing of check valves 842A/B once every 54 months
VR-9	VR-6	Previously approved for full flow testing of check valves 867A/B once every 54 months
VR-10	ROJ-6	Reformatted as a refueling outage justification for cold leg SI check valves 878G/J
VR-11	ROJ-7	Reformatted as a refueling outage justification for SI pump discharge check valves 889A/B
VR-12	ROJ-9	Reformatted as a refueling outage justification for instrument air AOV 5392
VR-13	ROJ-5	Reformatted as a refueling outage justification for recirculation AOVs 4291, 4304, 4310, 9710A and 9710B
VR-14	ROJ-3	Reformatted as a refueling outage justification for RHR check valves 853A/B
VR-15	VR-7	Previously approved for relief from stroke time testing of SOVs 8616A/B and 8619A/B
VR-16	VR-8	Previously approved for relief from OM-1 testing for AOV 392A
VR-17	None	Previously deleted during 3 <sup>rd</sup> interval - (SWP discharge check valves 4601, 4602, 4603 and 4604)
VR-18	TJ-3	Reformatted as a technical justification for testing skid-mounted SOVs 5907, 5907A, 5908 and 5908A

3 <sup>rd</sup> Interval Relief Request	4 <sup>th</sup> Interval Document	Changes
VR-19	ROJ-1	Reformatted as a refueling outage justification for Overpressure Protection System check valves 8606A/B
VR-20	ROJ-2	Reformatted as a refueling outage justification for RHR pump discharge check valves 710A/B
VR-21	CS-30	Reformatted as a cold shutdown justification for Main Feedwater System check valves 3992 and 3993
VR-22	None	Previously deleted during 3 <sup>rd</sup> interval - (SI accumulator discharge MOVs 841 and 865)
VR-23	None	Previously deleted during 3 <sup>rd</sup> interval - (TDAFW Pump recirculation check valve)
VR-24	None	Deleted for containment spray pump discharge check valves 862A/B since OM-10 permits mechanical exercise
VR-25	None	Previously deleted during 3 <sup>rd</sup> interval - (EDG air start check valves 5941A/B)
VR-26	VR-9	Previously approved for auxiliary feedwater check valves 3998, 4000C/D, 4003 and 4004
VR-27	VR-10	Previously approved for standby auxiliary feedwater check valves 9704A/B and 9705A/B
VR-28	None	Previously deleted during 3 <sup>rd</sup> interval - (Spent Fuel Pool Recirculating Pump A discharge check valve 8655)
VR-29	CS-4	Reformatted as a cold shutdown justification for RHR heat exchanger outlet check valves 697A/B
VR-30	None	Previously deleted during 3 <sup>rd</sup> interval - (Auxiliary feedwater AOVs 4297, 4298, 4480 and 4481)
VR-31	VR-11	Previously approved for containment spray test line manual isolation valves
VR-32	VR-12	Previously approved for fire service water check valve 9229