

ROCHESTER GAS & ELECTRIC CORPORATION  
R. E. Ginna Station, Fourth Interval Inservice Testing Program

RELIEF REQUEST PR-2

SYSTEM: Various

COMPONENT: All IST Pumps

CATEGORY: Various

SAFETY CLASS: Various

FUNCTION: Various

TEST REQUIREMENT: OMa-1988, Part 6, paragraph 6.1 states that if deviations fall within the alert range of Table 3, the frequency of testing specified in paragraph 5.1 shall be doubled until the cause of the deviation is determined and the condition corrected. If deviations fall within the required action range of Table 3, the pump shall be declared inoperable until the cause of the deviation has been determined and the condition corrected.

BASIS FOR RELIEF: Rochester Gas & Electric (RG&E) submits this relief request for Nuclear Regulatory Commission (NRC) review and approval in accordance with 10CFR50.55a (a)(3)(ii). Compliance with the specified requirement results in hardship or unusual difficulty without a compensating increase in the level of quality and safety. It is an unnecessary hardship to continue to test a pump on increased frequency or to perform unnecessary maintenance on a pump to satisfy the requirements of OMa-1988, Part 6 should it be clear that the pump is operating acceptably. In such instances, the unnecessary increased testing or maintenance reduces system availability and increases entry into Technical Specification Limiting Conditions for Operation. Such action is not consistent with availability goals established in accordance with 10 CFR 50.65, "Requirements for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants". Further, repairing a pump that is operating acceptably and within prescribed design parameters does not provide a compensating increase in the level of quality and safety.

OMa-1988, Part 6, paragraph 6.1 does not specifically state it is permissible to analyze pumps that have entered the alert or required action ranges. The 1998 Edition, 2000 Addenda of the OM-Code, paragraph ISTB-6200(c) provides a means to analyze, and if justified, establish new references values for pump testing at the changed values. This was incorporated by reference in 10 CFR 50.55a with an amendment to that regulation effective October 28, 2002. Per 10 CFR 50.55a(f)(4)(iv), "Inservice tests of pumps and valves may meet the requirements set forth in subsequent editions and addenda that are incorporated by reference in paragraph (b) of this section, subject to the limitations and modifications listed in paragraph (b) of this section, and subject to Commission approval. Portions of editions or addenda may be used provided that all related requirements of the respective editions or addenda are met."

ALTERNATE TESTING: RG&E proposes to incorporate paragraph ISTB 6200(c), "New Reference Values" into the Ginna Station fourth interval IST program as an addition to the requirements of OMa-1988, part 6, paragraph 6.1. This will facilitate analysis of a pump whose test parameters are within either the alert or required action range of Table 3 of OMa-1988, Part 6, for the purpose of establishing new reference values. References to Table ISTB-5100-1, Table ISTB-5200-1, Table ISTB-5300-1, and Table ISTB-5300-2 shall be understood to refer to the Ranges and Test Parameters in OMa-1988, Part 6, Table 3. RG&E will continue to test the pumps at the frequency specified in OMa-1988, paragraph 5.1 "Frequency of Inservice Tests." The analysis performed per ISTB 6200(c) shall include verification of the pump's operational readiness. This paragraph also requires that the analysis shall include both a pump and system level evaluation of operational readiness, the cause of the change in pump performance, and an evaluation of all trends indicated by available data. The results of the analysis shall be documented in the Record of Tests as specified in paragraph 7.3 of OMa-1988, Part 6.

### List of Regulatory Commitments

The following table identifies those actions committed to by Rochester Gas & Electric in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments. Please direct questions regarding these commitments to Mr. Tom Harding, 585-771-3384.

REGULATORY COMMITMENT	DUE DATE
None	N/A