

August 8, 2003

Mr. Robert L. Clark
Office of Nuclear Regulatory Regulation
U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-0001

Subject: Submittal of Relief Request VR-8 Related to the Requirements of
10CFR50.55a(f), "Inservice testing requirements"
Rochester Gas and Electric Corporation
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

- References:
- (1) Letter from M. Gamberoni, NRC, to R.C. Mecredy, RG&E, Subject:
*REQUESTS FOR RELIEF FROM THE AMERICAN SOCIETY OF
MECHANICAL ENGINEERS BOILER AND PRESSURE VESSEL CODE
(ASME CODE) SECTION XI REQUIREMENTS FOR THE R. E. GINNA
NUCLEAR POWER PLANT FOURTH 10-YEAR INTERVAL OF THE
PUMP AND VALVE INSERVICE TESTING PROGRAM (TAC NO.
MA7265), dated June 13, 2000.*
 - (2) Letter from R.C. Mecredy, RG&E, to G.S. Vissing, NRC, Submittal of
"Ginna Station Fourth Interval Inservice Testing (IST) Program, along
with the associated Relief Requests, Cold Shutdown Justifications, and
Refueling Outage Justifications", dated November 24, 1999.

Dear Mr. Clark:

By letter dated June 13, 2000 (Reference 1), the NRC provided approval of the relief requests associated with the Ginna Station fourth 10-year interval inservice testing (IST) program for pumps and valves (Reference 2). The current Ginna Station IST program has been developed as required by Title 10 Code of Federal Regulations Part 50, Paragraph 50.55a(f), in accordance with the 1989 Edition of the ASME Boiler and Pressure Vessel Code - Section XI - "Rules for Inservice Inspection of Nuclear Power Plant Components". This edition refers directly to the ASME/ANSI OMA-1988 standard for pump testing (Part 6) and for valve testing (Part 10).


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Additionally, OMa-1988, Part 10 refers to ASME/ANSI OM-1987, Part 1, for pressure relief device testing. Rochester Gas and Electric (RG&E) intends to begin utilizing Appendix I of ASME OM CODE-1998 in lieu of ASME/ANSI OM-1987 Part 1 for pressure relief device testing in advance of December 31, 2003. The Appendix I of ASME OM Code-1998 was incorporated by reference in 10 CFR 50.55a with an amendment to that regulation effective October 28, 2002. As such, RG&E may implement Appendix I of ASME OM Code-1998 without NRC approval.

However, updating to a newer approved ASME Code results in the need to revise the currently approved relief request VR-8 in regards to the referenced Code paragraph. The attached revised Relief Request VR-8 requests relief from Paragraph I-7360 of Appendix I of ASME OM CODE-1998, which requires that certain typical bench testing be performed on relief valves. The affected valve is a welded inline air-operated valve which also performs a relief function at a specific differential pressure. The bench tests listed in the applicable paragraph cannot practically be performed. As an alternative, RG&E proposes that the valve continue to be tested in place each refueling outage by verifying that it will open and pass the required flow at design differential pressure.

The purpose of this letter is to request that the NRC grant RG&E continued relief from certain IST program code requirements pursuant to 10 CFR 50.55a(f)(5)(iii). The details and basis for this relief request is provided in the attachment to this letter. RG&E requests relief for the remainder of the Ginna Station IST program fourth 10-year interval.

RG&E requests NRC approval of this relief request by November 30, 2003. If you should have any questions regarding this submittal, please contact Mr. Thomas Harding, 585-771-3384.

Very truly yours,



Robert C. Mecredy

attachments

xc: Mr. Robert Clark (Mail Stop O-8-C2)
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U.S. NRC Ginna Senior Resident Inspector

U.S. NRC Ginna Senior Resident Inspector

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

RELIEF REQUEST VR-8

SYSTEM: CVCS Charging

VALVES: 392A

CATEGORY: B/C

SAFETY CLASS: 2

FUNCTION: Valve 392A functions as a relief valve when closed to provide a charging system flowpath to the reactor coolant system loop B hot leg.

TEST REQUIREMENT: Safety and relief valves shall meet the inservice test requirements of Appendix I of ASME OM Code-1998.

BASIS FOR RELIEF: Paragraph I-7360 of Appendix I of ASME OM Code-1998 requires that certain typical bench testing be performed on relief valves. This valve is a welded inline air-operated valve which also performs a relief function at a specific differential pressure. The bench tests listed in this paragraph cannot practically be performed on valve 392A.

ALTERNATE TESTING: Valve 392A will be tested in place each refueling outage by verifying that it will open and pass the required flow at design differential pressure.

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. Thomas Harding, 585-771-3384.

REGULATORY COMMITMENT	DUE DATE
None	N/A