

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8001230168 DOC. DATE: 80/01/16 NOTARIZED: YES DOCKET #
 FACIL: 50-244 Robert Emmet Ginna Nuclear Plant, Unit 1, Rochester G 05000244
 AUTH. NAME: AMISH, K.W. AUTHOR AFFILIATION: Rochester Gas & Electric Corp.
 RECIP. NAME: DENTON, H.R. RECIPIENT AFFILIATION: Office of Nuclear Reactor Regulation

SUBJECT: Responds to NRC 800102 show cause order re implementation of
 Lessons Learned Task Force Category A requirements. Util
 791017, 1119 & 1213 ltrs described intentions. All Category A
 requirements except Item 2.1-4, have been implemented.

DISTRIBUTION CODE: A039S COPIES RECEIVED: LTR 1 ENCL 0 SIZE: 4
 TITLE: Resp to Lesson Learn Task Force - Westinghouse

NOTES: 1. C. H. HOFMAYER, J. SHAPAKER

ACTION:	RECIPIENT	COPIES		RECIPIENT	COPIES	
	ID CODE/NAME	LTTR	ENCL		ID CODE/NAME	LTTR
INTERNAL:	10 BC ORB#2	7	7			
	1 REG FILE	1	1	17 I & E	2	2
	19 TA/EDO	1	1	2 NRC PDR	1	1
	20 CORE PERF BR	1	1	21 ENG BR	1	1
	22 REAC SFTY BR	1	1	23 PLANT SYS BR	1	1
	24 EEB	1	1	25 EFLT TRT SYS	1	1
	3 LPDR	1	1	4 NSIC	1	1
	5 J OLSHINSKI	1	1	6 J KERRIGAN	1	1
	7 J BURDION	1	1	8 C WILLIS	1	1
	9 G IMBRO	1	1	J. T. TELFORD	2	2
	M FIELDS	1	1	N ANDERSON	1	1
	OELD	1	0	P O'REILLY	1	1

EXTERNAL: 26 ACRS 16 16

APP: H. DENTON

LTR ENCL
 1 0

JAN 24 1980

TOTAL NUMBER OF COPIES REQUIRED: LTTR

50 48
 47 ENCL 46

146
 1747

THE UNITED STATES OF AMERICA
DO hereby certify that
[Name] is a citizen of the United States of America.

Witness my hand and seal of office this [Date] day of [Month], 19[Year].

Attest: [Signature]

[Signature]

[Signature]

[Signature]

[Signature]

[Signature]

[Signature]

[Signature]

[Signature]

[Signature]

[Signature]

[Signature]

[Signature]

[Signature]

[Signature]

[Signature]

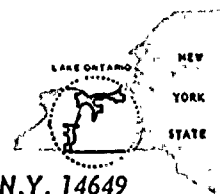
[Signature]

[Signature]

[Signature]



ROCHESTER GAS AND ELECTRIC CORPORATION • 89 EAST AVENUE, ROCHESTER, N.Y. 14649



KEITH W. AMISH
EXECUTIVE VICE PRESIDENT

TELEPHONE
AREA CODE 716 546-2700

January 16, 1980

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Three Mile Island Short Term Lessons Learned
Show Cause Order
R.E. Ginna Nuclear Power Plant
Docket 50-244

Dear Mr. Denton:

An order dated January 2, 1980 required, in effect, that we show cause why we should not by January 31, 1980 implement all "Category A" short term lessons learned requirements except those for which necessary equipment is unavailable, or maintain Ginna in a cold shutdown or refueling mode of operation. We have previously submitted the required information and conversations with you and members of your staff have indicated that our implementation of the requirements is acceptable. The information specifically required to address the Show Cause Order is repeated here.

Our letters of October 17, 1979, November 19, 1979, December 13, 1979 and December 28, 1979 described our intentions to comply with the short term lessons learned requirements and documented our methods of compliance. All of the category A requirements except item 2.1.4, Containment Isolation, have been implemented.

The existing containment isolation system conforms with the diversity requirements of the staff position and automatically isolates all nonessential systems not already isolated. There are some valves, however, which could reopen upon reset of the containment isolation or containment ventilation isolation signals if their controllers were set for the open position. A system modification has been designed which will provide for individual resetting of all isolation valves to eliminate the possibility of an inadvertent opening following reset. Until this modification is installed, the reopening of the valves is precluded and an equivalent level of safety is provided by alternative means. First, the operator has been directed to place all isolation valve position controllers in the closed position so that no valve will open

A039
5
110
ADD: 4/12 Ex

H. DENTON 1 0

8001230 168

DATE January 16, 1980

TO Mr. Harold R. Denton, Director

2

on initiation of reset. Reset of containment ventilation isolation and containment isolation can be actuated only through the use of key switches. Keys are under the control of the Shift Supervisor. Therefore, no single operator error can result in improper use of the reset function.

The modification requires installation of four relay cabinets containing over 190 relays and two panels with 50 pushbuttons each. The equipment is being manufactured by Electro-Mechanics, Incorporated of New Britain, Connecticut. Our order (N-EZ-03445) was placed with them on November 26, 1979, however, work was formally initiated on the modification by Rochester Gas and Electric Corporation on August 24, 1979 with the issuance of an Engineering Work Request. Work that was performed between August and November included systems analysis to define and scope the modification, conceptual design, design review and choice of system approach, basic system design, review of vendor capabilities, equipment description and specification preparation, proposal preparation and review and vendor selection.

Electro-Mechanics is performing some of the detailed design and the fabrication of the equipment. Delivery of the equipment has been quoted as twenty-two weeks after receipt of order. We are attempting to expedite the delivery wherever possible, however receipt of materials from subvendors largely determines the delivery date. Electro-Mechanics has been instructed to use premium time whenever it will result in a schedule improvement.

Equipment delivery from Electro-Mechanics is expected in early May, 1980. We plan to install the equipment within 30 days of receipt but no later than June 1, 1980. Installation of the equipment requires a plant outage and is estimated to take approximately three weeks. Some of the work can be performed prior to equipment delivery to prepare for the cabinet installation and testing if the plant is shutdown.

The above information plus the address and telephone number of Electro-Mechanics were provided to a member of your staff on January 8, 1980.

This letter, provides appropriate and timely justification for continued operation of the R.E. Ginna Nuclear Power Plant. Equipment necessary for mechanical modifications to meet the

ROCHESTER GAS AND ELECTRIC CORP.

SHEET NO.

DATE January 16, 1980

TO Mr. Harold R. Denton, Director

3

staff requirements is unavailable before January 31, 1980, however alternative means of adequately protecting the public health and safety have been implemented.

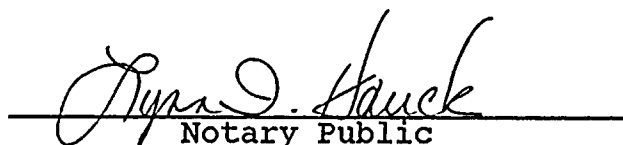
Sincerely yours,



Keith W. Amish

Subscribed and sworn to before me

this 17th day of January, 1980.


Notary Public

LYNN I. HAUCK

NOTARY PUBLIC, State of N.Y., Monroe County

My Commission Expires March 30, 1982

2-1



1000

1000

1000

1000

1000

1000

1000

1000

1000

1000

1000

1000

1000

1000

1000

1000

1000

1000

1000

Mr. Harold R. Denton

-4-

January 16, 1980

cc w/enclosure:

Mr. Michael Slade
12 Trailwood Circle
Rochester, New York 14618

Jeffrey Cohen
New York State Energy Office
Swan Street Building
Core 1, Second Floor
Empire State Plaza
Albany, New York 12223

Edward G. Ketchen, Esquire
Office of the Executive
Legal Director
U.S. Nuclear Regulatory
Commission
Washington, DC 20555

Director, Technical Development Programs
State of New York Energy Office
Agency Building 2
Empire State Plaza
Albany, New York 12223

Supervisor of the Town of Ontario
107 Ridge Road West
Ontario, New York 14519

Director, Technical Assessment
Division
Office of Radiation Programs
(AW-459)
U.S. Environmental Protection Agency
Crystal Mall #2
Arlington, Virginia 20460

U.S. Environmental Protection Agency
Region II Office
ATTN: EIS Coordinator
26 Federal Plaza
New York, New York 10007

Herbert Grossman, Esq., Chairman
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dr. Richard F. Cole
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dr. Emmeth A. Luebke
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, DC 20555

