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 AUTH. NAME: AUTHOR AFFILIATION
 WHITE, L. D. Rochester Gas & Electric Corp.
 RECIP. NAME: RECIPIENT AFFILIATION
 ZIEMANN, D. L. Operating Reactors Branch 2

SUBJECT: Responds to NRC 800211 ltr re addl info on containment purge
 & vent sys. Existing sys being modified per NUREG-0578 to
 require individual resetting of any containment isolation
 valve required to open when initiating signal present.

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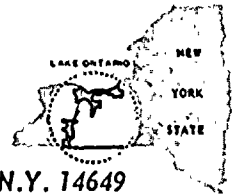
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LEON D. WHITE, JR.
VICE PRESIDENT

TELEPHONE
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March 17, 1980

Director of Nuclear Reactor Regulation
Attention: Mr. Dennis L. Ziemann, Chief
Operating Reactors Branch No. 2
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: SEP Topic VI-4, Containment Isolation System
R. E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Ziemann:

This letter is in response to your February 11, 1980 letter, which requested the following additional information concerning the Ginna containment purge and vent systems.

1. The overriding of one type of safety actuation signal should not cause the blocking of any other type of safety actuation signal to the isolation valves. The Ginna plant engineered safety features apparently have several overrides that block even manual actuation.

Response:

As stated in our letter to you on the subject system, dated December 14, 1979, the containment purge system has been designed to provide purging capability following a LOCA, when high containment radiation and SI signals may be present, to limit potential hydrogen concentrations in containment during the post accident period. In order to perform this safety function, the reset system is designed to override all containment isolation initiating signals as long as any actuating signal is present.

The existing reset system is being modified in accordance with Section 2.1.4 and Appendix A 2.1.4 of NUREG 0578, to require individual resetting of any containment isolation valve which may be required to open while a C.I. initiating signal is present. At least three deliberate operator actions, including operation of the containment isolation

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DATE March 17, 1980

TO Mr. Dennis L. Ziemann, Chief

2

key switch, must be performed by the operator before any two redundant isolation valves (potential release path) are opened (e.g., purge exhaust). This virtually precludes inadvertent violation of containment isolation. Procedures require extensive review of plant conditions before initiating any action which would require the opening of an isolation valve after an event which has caused containment isolation. If it were decided to perform a containment purge during accident conditions, great care would be taken during this operation. The personnel performing this safety function would be aware of the significance of the action, and would be prepared to close the valves if necessary for any reason. Re-establishing containment isolation would be a quick, simple process (closing the appropriate valve switches). It is not considered that this process requires any further simplification (such as having a system - level manual isolation switch).

Another set of circumstances wherein the containment ventilation isolation valves are blocked from closing upon receipt of a safety actuation signal is described in our December 14, 1979 letter on this subject. In the event these valves are open, and high activity (but no SI signal) is present, administrative procedures ensure that the reset will not be used until the high activity alarm has been cleared. The SI signal will thus no longer be blocked, and be capable of effecting valve closure.

2. The system level annunciation of the overridden status should be provided for every safety system impacted when an override is active. The Ginna plant apparently does not have this capability.

Response:

As noted in our response to item (1) above, the reset panel matrix clearly displays any isolation valve which is in a reset status.

The requirement referred to for system level annunciation of overridden status of safety systems is contained in Regulatory Guide 1.47, Bypassed and Inoperable Status Indication for Nuclear Power Plant Safety Systems which was issued in May 1973. The extent to which plants, such as R.E. Ginna, which were designed and constructed prior to the issuance of this Regulatory Guide, are required to implement its requirements is currently the subject of generic review under the SEP program and TMI related NRC staff programs. It is our position that status monitoring modifications should only be made on an integrated basis for all safety systems in accordance with careful consideration of the man-machine interface.



DATE March 17, 1980

TO Mr. Dennis L. Ziemann, Chief

3

Treating individual systems, such as containment isolation, without regard to maintaining a consistent status monitoring approach to all safety systems could lead to operator confusion and error.

3. The instrumentation and control systems provided to initiate engineered safety features should be designed and qualified as safety grade equipment. Discuss the qualification of the isolation channel and radiation channel equipment in this regard.

Response:

The containment isolation system, including the actuating channels, was designed and constructed as a Class IE system. Qualification of electrical and I&C equipment has been described in our report to A. Schwencer, dated February 24, 1978, on the subject. "Environmental Qualification of Electrical Equipment, R.E. Ginna Nuclear Power Plant Unit No. 1". This topic is currently being reviewed generically under the SEP program.

4. The overriding or resetting of the isolation actuation signal should not cause the automatic motion of any Engineered Safety Feature valve. Your letter of October 17, 1979 and November 19, 1979 indicate that a modification is planned for the upcoming March refueling outage.

Describe how the modification will prevent automatic valve position changes on resetting of isolation logic, including schematic diagrams or sketches as necessary.

Response:

The detailed design of the containment isolation modification which requires individual reset for each isolation valve is being reviewed as part of the Short-Term Lessons Learned Program.

Very truly yours,



L. D. White, Jr.

LDW:np