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 FACIL: 50-244 Robert Emmet Ginna Nuclear Plant, Unit 1, Rochester G 05000244
 AUTH. NAME AUTHOR AFFILIATION
 MECREDY, R.C. Rochester Gas & Electric Corp.
 RECIP. NAME RECIPIENT AFFILIATION
 JOHNSON, A.R. Project Directorate I-3

SUBJECT: Submits util position on Generic Ltr 89-04, "Inservice Pump & Valve Testing Program."

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October 27, 1989

TELEPHONE
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U.S. Nuclear Regulatory Commission
Document Control Desk
Attn: Allen R. Johnson
Project Directorate I-3
Washington, D.C. 20555

Subject: Inservice Pump and Valve Testing (IST) Program
Generic Letter 89-04
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Johnson:

In RG&E's May 23, 1989 submittal of the Ginna Station 1990-1999 Inservice Pump and Valve Testing (IST) Program, we stated that a clarification of our position on Generic Letter 89-04, Attachment 1, Position 4, would be provided. This relates to the individual testing of series check valves. At Ginna Station, the two safety injection lines to the RCS hot legs include two check valves in series, and a locked closed MOV. Safety injection to the RCS hot legs is no longer used in the Ginna Station UFSAR Chapter 15 accident analyses. The high to low pressure system (Event V) isolation function is satisfied by the locked closed MOV, plus either of the two check valves. Thus, RG&E uses the two check valves in series as one boundary, and there is no need to individually test each of these series check valves.

In an October 16, 1989 telecon among RG&E, NRC, and EG&G personnel, it was requested that RG&E commit to specific actions, if the series hot leg check valves failed their periodic leak test. In accordance with Technical Specification 4.3.3.3, it would be required that both of the check valves be inspected to establish the cause of the leakage. Although it is anticipated that in such cases both of the series check valves would be refurbished, RG&E reserves the right to remove the internals of one of the check valves, and rely on one check valve and the locked closed MOV as the high to low pressure system boundary. This could only be done pending NRC approval of a license amendment to paragraph 4.3.3.3 of the Ginna Technical Specifications.

Another issue discussed during the October 16, 1989 telecon concerned Relief Request VR-21. The NRC requested that more detail be provided relative to the basis for not performing check valve (3992 and 3993) testing at cold shutdowns resulting from reactor trips. RG&E explained that in order to test these valves, field instrumentation and personnel observation is required. Under plant trip conditions, RG&E personnel could not be dispatched to perform proper measurements in an appropriate time frame. This relief request is thus considered valid as written.

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Finally, RG&E will be proposing a revised relief request (VR-8) for check valves 842A,B and 867A,B (accumulator discharge). The detailed relief request is being prepared, and will be mailed under separate cover. A synopsis of the relief request is provided here for information. Based on the results of implementation of the disassembly requirements for these check valves during the 1989 Refueling Outage, RG&E will propose to extend the sample disassembly and inspection interval. The inspection revealed no observable evidence of excessive wear or deterioration, following 15 years of operation for the 842A/B check valves and 20 years of operation for the 867A/B check valves since the previous refurbishment of these valves. The records of these inspections are available at Ginna Station.

The actual disassembly process is extremely burdensome, however. Because of the location of these valves relative to the reactor coolant system, it would be required to defuel the reactor, or use freeze seals, in order to perform this inspection. The 1989 actual inspection and refurbishment resulted in a personnel radiation exposure in excess of 3 person-rem. A defueling would require an additional 2.2 person-rem. Therefore, RG&E intends to keep the family of valves as 2 groups of .2 and extend the disassembly interval to every 10 years (i.e., all 4 valves during each ten year reactor vessel examination, which requires defueling). Partial flow testing would continue on an annual basis. This testing/disassembly methodology and interval is consistent with the techniques which have maintained the valves functionally acceptable, with no observable degradation, for the past 20 years.

Very truly yours,



Robert C. Mecredy
General Manager
Nuclear Production

GJW\064
Attachments

xc: U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

Ginna Senior Resident Inspector