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ACCESSION NBR:9109190225 DOC.DATE: 91/06/17 NOTARIZED: NO DOCKET #
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JOHNSON,A.R. Project Directorate I-3

SUBJECT: Suppls 890203 response to Generic Ltr 88-14, "Instrument
Air Supply Sys Problems Affecting Safety-Related Equipment."
Results of air quality testing at facility in Mar & Apr
1989 listed.

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June 17, 1991

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

Subject: Generic Letter 88-14
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Johnson:

This letter is being provided in response to the reporting provisions of Generic Letter 88-14, "Instrument Air Supply System Problems Affecting Safety Related Equipment." In that Generic Letter, it was requested that RG&E provide a written notification that all necessary actions taken to implement our commitments are complete (as specified in our February 3, 1989 response).

Generic Letter 88-14 requested confirmation of actions taken to implement four specific actions. Based on a review of NUREG-1275 Volume 2 and Generic Letter 88-14 the four actions, and our results, are as follows:

Action 1: Verification by test that actual instrument air quality is consistent with the manufacturer's recommendation for individual components served.

Results: In March and April of 1989, RG&E performed air quality testing of the Ginna Station Instrument Air System. This testing monitored the parameters specified in ANSI/ISA Standard S7.3-1975 (R1981), "Quality Standard for Instrument Air". These parameters, and the results obtained, were:

- a. Dew Point: -39°F (at line pressure)
- b. Particle Size: None larger than 3 microns
- c. Oil Content: None measurable

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TO Mr. Allen R. Johnson

The Instrument Air System intake at the Ginna Station is located in an area free of chemical contaminants. The system has no scrubber or other equipment utilized for the removal of chemical contaminants from the system. Therefore, no contamination tests were performed to check the effectiveness of any such equipment. This is consistent with the guidance of ISA RP7.7-1984, "Recommended Practice for Producing Quality Instrument Air."

Action 2: Verification that maintenance practices, emergency procedures, and training are adequate to ensure that safety-related equipment will function as intended on a loss of instrument air.

Results: All Instrument Air System maintenance practices, operating procedures, annunciator procedures, emergency procedures, training scenarios, and training lesson plans were reviewed as part of an overall Instrument Air System functional inspection. This review indicated that these items were acceptable and that the Instrument Air System would function as intended upon a loss of instrument air pressure.

Additionally, a detailed review of the Ginna Station Air-Operated Valve test procedures was performed to verify that the failure position of each safety-related, pneumatically-operated valve had been identified. This review confirmed that these air-operated valves in the plant would function as intended upon a loss of instrument air.

The Ginna Station Quality Assurance Manual, Appendix C, "Inservice Pump and Valve Testing Program" governs testing of safety-related, air-operated valves.

Action 3: Verification that the design of the Instrument Air System is in accordance with its intended function. This includes verification by test that air-operated safety components will perform as expected.

Results: The design basis of the Instrument Air System was researched and documented in a Design Basis Document (DBD). The Instrument Air System itself was also tested to demonstrate that design requirements for air flow, pressure, and air quality specified in the original design continue to be maintained.

Through the DBD (which included an Instrument Air System Description) and the testing performed to demonstrate the functionality of system components, it

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was verified that the system design is consistent with the original design specifications and requirements.

Action 4: A discussion of the program for maintaining proper instrument air quality.

Results:

The following Preventative Maintenance, Test and Monitoring Program has been implemented to ensure the continued high quality of instrument air:

1. Annual major inspection and maintenance of each compressor and moisture trap.
2. Annual filter and dryer dessicant inspection and/or replacement.
3. Semi-annual minor inspection of compressor (inlet and discharge valve) and inlet air filter.
4. Quarterly aftercooler backflush.
5. Quarterly dewpoint and flow tests.
6. Annual hydrocarbon and particle sampling.
7. Annual calibration of compressor indicators, alarms, and controls.
8. Blowdown of air receivers each shift.
9. Monitoring air filter differential pressure each shift.

RG&E has completed all of these actions, and will retain the documentation verification for a minimum of two years.

Very truly yours,

Robert C. Mecredy
Robert C. Mecredy

xc: Mr. Allen R. Johnson^d (Mail Stop 14D1)
Project Directorate I-3
Washington, D.C. 20555

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Ginna Senior Resident Inspector

*South coming for
clarification*

*Blow down of after cooler
up stream of Air receivers*

