

ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8906050144 DOC. DATE: 89/05/23 NOTARIZED: NO DOCKET #
 FACIL: 50-244 Robert Emmet Ginna Nuclear Plant, Unit 1, Rochester G 05000244
 AUTH. NAME AUTHORITY AFFILIATION
 MECREDY, R.C. Rochester Gas & Electric Corp.
 RECIP. NAME RECIPIENT AFFILIATION
 JOHNSON, A. Project Directorate I-3

SUBJECT: Forwards "QA Manual Ginna Station RGE App C Inservice Pump & Valve Testing Program for 1990-99 Interval."

DISTRIBUTION CODE: A047D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 3 + 167
 TITLE: OR Submittal: Inservice Inspection/Testing/Relief from ASME Code

NOTES: License Exp date in accordance with 10CFR2,2.109(9/19/72). 05000244

	RECIPIENT ID CODE/NAME	COPIES LTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTR ENCL
	PD1-3 LA JOHNSON, A	1 0 1 1	PD1-3 PD	2 2
INTERNAL:	AEOD/DSP/TPAB	1 1	NRR/DEST/MEB 9H	1 1
	NRR/DEST/MTB 9H	1 1	NUDOCS-ABSTRACT	1 1
	OC/LFMB	1 0	OGC/HDS2	1 0
	<u>REG FILE</u> 01	1 1	RES/DSIR/EIB	1 1
EXTERNAL:	EG&G BROWN, B	1 1	EG&G ROCKHOLD, H	1 2
	LPDR	1 1	NL 007 HEMMING	1 2
	NRC PDR	1 1	NSIC	1 1

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK,
 ROOM P1-37 (EXT. 20079) TO ELIMINATE YOUR NAME FROM DISTRIBUTION
 LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTR 21 ENCL 12

R
I
D
S
/
A
D
D
S

m/A-2
 [Signature]



ROCHESTER GAS AND ELECTRIC CORPORATION • 89 EAST AVENUE, ROCHESTER, N.Y. 14649-0001

TELEPHONE
AREA CODE 716 546-2700

May 23, 1989

U.S. Nuclear Regulatory Commission
Document Control Desk
Attn: Mr. Allen Johnson
PWR Project Directorate I-3
Division of Reactor Projects I/II
Washington, D.C. 20555

SUBJECT: Inservice Pump and Valve Testing Program
R. E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Johnson:

In accordance with requirements of 10 CFR Part 50, Section 50.55a, paragraph (g), we have enclosed the Ginna Station Inservice Pump and Valve Testing (IST) Program for the January 1, 1990 through December 31, 1999 interval for your review and approval. This program will direct surveillance requirements delineated in Technical Specifications Section 4.2 for the Inservice Pump and Valve Testing Program. The enclosure is entitled "Appendix C Inservice Pump and Valve Testing Program for the 1990-1999 Interval." This program closely parallels the recently revised RG&E IST program for 1989 endorsed by your letter dated May 3, 1989. In accordance with 10 CFR 50.55a paragraph (g)(4)(ii), this program is based on the 1986 Edition of ASME Section XI:

The enclosed 10 year submittal was reviewed to positions delineated in Attachment 1 of USNRC Generic Letter 89-04 issued on April 3, 1989. The program complies with positions of Attachment 1 with one possible exception. Position 4 of Attachment 1 would require two series check valves in Event V configurations to be individually tested. The Ginna configuration for Safety Injection to each Reactor Coolant System Hot Leg contains two series check valves in series with a locked closed, deenergized motor operated valve. The motor operated valve is leak tested along with a leak test conducted on the check valves in series. An evaluation has been initiated to determine if this is a discrepancy. The resolution, to be provided prior to August 1, 1989, will either involve further clarification to Technical Specifications, further clarification of this submittal or a commitment to a future modification.

8906050144 890523
PDR ADCK 05000244
P PDC

A047
11

Generic Letter 89-04, Attachment 1 - Position 11 identifies examples of valves and pumps or valve groups that have generally and erroneously been omitted from IST programs. Such items are included in the program as Management directed upgrades or from a good Engineering practice standpoint, when they are applicable to RG&E's System Selection Criteria. The following EG&G response numbers documented in our submittal dated December 20, 1988 substantiate the exclusion of some of these examples from the IST Program.

Position 11 reference	EG&G Response Number
Control Room Chilled Water	H-2
Accumulator MOVs/Vents	E-10
Auxiliary Przr Spray	B-1
Boric Acid Transfer Pumps	B-7; 2-7
Valves in Emergency Borate Flowpath	B-7; 2-7

Since our December 20, 1988 response to the 99 EG&G questions provided in your June 21, 1988 letter to Mr. R.W. Kober, a change in our response to Questions B-2, B-5, D-4, E-3, E-5, F-4, L-1, P-6 and P-9 has occurred as follows:

- The B-2 and B-5 responses indicated that valves 204A, 427 and 820 were to be tested as either pressure or containment isolation valves. With the reclassification of letdown isolation valves 200A, 200B, 202 to serve as both pressure and containment isolation functions, valves 204A, 427 and 820 are not required to be included in the IST program.
- The D-4 response indicated that full stroke exercising flow rates for CCW valves 723A and B was 2500 GPM. Subsequent evaluation indicates that these valves will be partial stroke tested to 2500 GPM quarterly and full stroke tested to 2980 GPM at cold shutdown. This is due to system configuration and test methods available at power.
- The E-3 response indicated full stroke exercise for SI pump discharge check valves 870A, 870B, 889A & 889B would occur during cold shutdowns. Due to low temperature overpressurization concerns for the reactor coolant system, a refueling frequency is now proposed consistent with relief request VR-11.
- The E-5 response indicated full stroke exercise for safety injection system pressure isolation valves 878G and 878J would occur during cold shutdowns. Due to low temperature overpressurization concerns for the reactor coolant system a refueling frequency is now proposed consistent with relief request VR-10.

- The F-4 response indicated that safety injection recirculation and test line return valves 897 and 898 would be exercised at cold shutdown as they were blocked open during normal operation. During the 1989 outage the air operated valves were replaced with motor operated valves permitting quarterly testing in accordance with the Code.
- The L-1 response provided a test method for closure verification of Main Feedwater check valves 3992 and 3993. An alternate method has been developed to test the valves during routine cold or refueling shutdowns involving a pressure drop verification. This will be used in lieu of the method previously described. For unscheduled shutdowns resulting from a plant trip, a relief request is provided to allow deferral of testing to the next planned cold shutdown or refueling.
- The P-6 response indicated that valve 857C was a passive valve which is kept locked open with power removed. During the 1989 outage the RHR to SI system cross-connect valves were upgraded. Valve 857C is now maintained closed and is required to open for high head safety injection recirculation. This valve has been included in the program and will be exercised in accordance with the Code.
- The P-9 response indicated that valve 822A had a safety function and would be added to the revised IST program as a Category A Class boundary valve. Subsequent review has determined that valve 822A is not a containment isolation valve, therefore negating its need to be included in the IST program.

Consideration was given to evaluating time and resources needed for an adequate pump and valve review to current criteria and guidelines established in Generic Letter 89-04. It was estimated that one year and approximately 2500 man-hours, as a minimum, would be required for existing programs.

Very truly yours,



Robert C. Mecredy
General Manager,
Nuclear Production

