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 STAHL, C. Project Directorate I-1

SUBJECT: Forwards addl info to satisfy requirements & intent of Parts
 3 & 4 of Gerneric Ltr 83-28, per 870928 commitment. Util to
 provide ongoing performance testing & monitoring program in
 place by 880531.

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April 4, 1988

U.S. Nuclear Regulatory Commission
Document Control Desk
Attn: Mr. Carl Stahle
PWR Project Directorate No. 1
Washington, D.C. 20555

Subject: Information on Generic Letter 83-28
Item 4.2 (Parts 3 & 4) for Ginna Station (TAC No. 53912)
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Stahle:

In my letter to you dated September 28, 1987 and of the same subject, a commitment was made to supply data and a timetable concerning the RG&E response to requirements in Item 4.2 of Generic Letter 83-28.

The attached material describes the RG&E approach to address the concerns of Item 4.2 (Parts 3 & 4) of Generic Letter 83-28. By May 31, 1988, we will have an ongoing performance testing and monitoring program in place.

Very truly yours,

Roger W. Kober

Attachment

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GINNA STATION

ADDITIONAL INFORMATION ON

ITEM 4.2 (PARTS 3 & 4) OF GENERIC LETTER 83-28

The information below is provided to document the RG&E commitment to satisfy the requirements and intent of parts 3 and 4 of Item 4.2 of generic letter 83-28.

The program initially proposed to utilize the results of the Westinghouse Owner Group (WOG) life cycle testing of DB-50 RTB's and fully expected the WOG program to satisfy the requirements of Item 4.2 of generic letter 83-28. The WOG results, as described in WCAP-10852, "Report of the DB-50 Reactor Trip Breaker Shunt and Undervoltage Trips Attachments Life Cycle Tests" demonstrated operability only of the STA and UVTA devices for a finite number of operations (2500 cycles) and did not address life qualification nor noncyclic life limiting aging of the STA and UVTA attachments.

To satisfy the requirements of the generic letter, RG&E plans to supplement the WOG program with an ongoing performance testing and monitoring program. Since 1985, RG&E has elected to independently monitor, the "as found" and "as left" response times of the UVTA and STA devices on each RTB. The data for the UVTA under similar conditions averages 6 cycles. The data for each breaker has been found to be consistent and averages 3.5 cycles for the STA. The Westinghouse DB-50 is designed to be a 4 cycle breaker when tripped by the shunt trip attachment. The response time data indicates that at the end of each refueling cycle, the RTB Tripping Characteristics are similar to what would be expected of new breakers. To date, no noncyclic degradation

of the tripping function has been detected. In addition, the measured response times are considerably less than the ten cycles assumed in the Ginna Station UFSAR. Therefore, should the "as found" response times show an upward trend and reach 8 cycles, the breaker components or the breaker itself will be replaced or repaired to maintain minimum performance requirements.

In addition, several key mechanical and electrical parameters, as listed below, are also being monitored and will be trended. Existing Ginna Station procedures are currently being used to accumulate data for use in a Parametric Trend Monitoring Program (PTMP) as recommended by your staff. The additional parameters that are being monitor include:

- a) The dropout voltage on the UVTA
- b) The mechanical force needed to operate the tripper bar
- c) RT breaker insulation resistance

The trending of the breaker response times and the trending of electrical and mechanical parameters will be used to identify age related degradation. If trends remain within specified guidelines there is assurance that the RTB will be operable when required. In this way the actual life of the two diverse RTB tripping devices will also be shown to be adequate.

The trended results of previous testing will be assembled and the establishment of the ongoing performance testing and monitoring program and component replacement plan will be in place by May 31, 1988.

