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 FACIL: 50-244 Robert Emmet Ginna Nuclear Plant, Unit 1, Rochester G. 05000244
 AUTH. NAME: AUTHOR AFFILIATION
 KOBER, R.W. Rochester Gas & Electric Corp.
 RECIP. NAME: RECIPIENT AFFILIATION
 ZWOLINSKI, J.A. Operating Reactors Branch 5.

SUBJECT: Responds to 841123 request for addl info re Generic Ltr
 83-28, Items 4.2.1 & 4.2.2. Breaker maint will be performed
 during annual refueling outages rather than at 6-month
 intervals.

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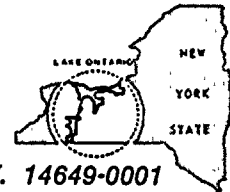
MEMORANDUM FOR THE CHIEF OF STAFF
 SUBJECT: [Illegible]

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ROGER W. KOBER
VICE PRESIDENT
ELECTRIC & STEAM PRODUCTION

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February 28, 1985

Director of Nuclear Reactor Regulation
Attention: Mr. John A. Zwolinski, Chief
Operating Reactors Branch No. 5
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: November 23, 1984 Request for Additional Information
Concerning Generic Letter 83-28
R. E. Ginna Nuclear Power Plant
Docket No. 50-244

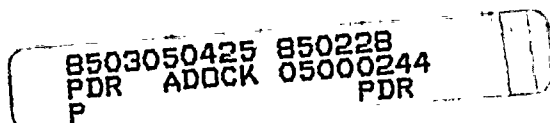
Dear Mr. Zwolinski:

The enclosure to this letter provides our response to the subject letter. Reference paragraphs in the enclosure with this letter correspond to paragraph numbers in the enclosure to your November 23 letter.

Very truly yours,

Roger W. Kober
Roger W. Kober

Enclosure



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Enclosure

Paragraph 1.2, Issues Relating to Item 4.2.1

Procedures have been written and all will have been approved and implemented by the completion of the scheduled 1985 refueling outage. These procedures will conform in intent to the Westinghouse Owners Group maintenance program (Revision 0 dated October 14, 1983) in the areas of concern listed in the attachment to your letter. In most cases the Ginna procedure will use the reference procedure word for word. We have renumbered the procedure steps and have used the Ginna procedure format rather than the reference procedure format. In addition we, in some cases, require that data be logged in a data sheet which in some cases is not required in individual steps in the WOG procedure. Further, in case of difficulty, the procedure does not specifically require that "Westinghouse Service Engineering" be called.

The Ginna experience with the Reactor Trip Switchgear is that when called upon to function, it has, without exception, performed. While our previous breaker maintenance program has not been documented to the extent required by the latest NRC guidelines, the lack of documentation has not diminished its effectiveness. Unless future experience indicates unexpected degradation, it is our intention to perform the maintenance only during our annual refueling outages rather than at six month intervals. We do not believe that overtesting of any device enhances its reliability.

Paragraph 2, Item 4.2.2, Trending of Reactor Trip Breaker Parameters to Forecast Degradation of Operability

The parameters of undervoltage trip attachment dropout voltage, trip force, and breaker insulation resistance will be trended as a way to detect degradation of the breakers and their ability to perform.

As a minimum, response time testing of each RT breaker will be performed each refueling outage. More frequent periodic online testing of breaker response time would be considered if life cycle testing shows that breaker trip response time degrades with operation. The acceptance criteria will be consistent with the maximum value assumed in the Ginna Station accident analysis. Specifically, accident analysis requires that the breaker must function (i.e., open after receiving the trip signal) within ten cycles. Should the response time exceed 8 cycles, procedures require that the breaker be either repaired or that trending be accomplished by testing every six months. Testing of the breaker response times for undervoltage trip has occurred during the 1983 and 1984 refueling outages. In 1983, breakers A&B tripped in 5.0 and 5.5 cycles, respectively, when actuation was initiated by loss of voltage to the undervoltage device. In the 1984 tests the trip times were 5.2 and 5.0 cycles, respectively.

In testing the undervoltage trip attachment, the dropout voltage will be measured and trended. In addition, maintenance procedures will include inspecting the gap between the UVTA trip lever and the breaker trip bar. This will be in addition to the response time testing listed above.

The shunt trip attachment will be tested to insure actuation of the tripping function when the applied voltage is only 70 VDC. In addition, the clearance between the trip lever and the trip bar will be checked.

