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 RECIP. NAME: RECIPIENT AFFILIATION:
 ZWOLINSKI, J.A. Operating Reactors Branch 5

SUBJECT: Responds to SER re Generic Ltr 83-28, Item 4.3. on reactor trip breaker automatic shunt trip. Decreasing reactor trip sys test interval will not provide sys reliability to justify added risks of spurious plant trips.

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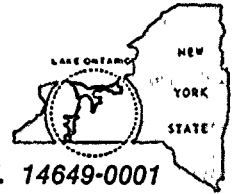
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ROGER W. KOBER
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November 19, 1985

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: RG&E Response to the Safety Evaluation
of Generic Letter 83-28, Item 4.3
Reactor Trip Breaker Automatic Shunt Trip

Dear Mr. Zwolinski:

This letter is in response to the Safety Evaluation Report (SER) by the Office of Nuclear Reactor Regulation concerning RG&E responses to Generic Letter 83-28, Item 4.3 submitted by letter dated August 19, 1985. This letter addresses compliance with NRC Staff positions regarding online testing, provision of test features, the provision of bypass breaker position indication, and bypass breaker interlocks.

On-Line Testing

Ginna Station has the capability to perform on-line Reactor Trip (RT) breaker testing. This capability is further discussed below. However, the RT breaker testing program has historically been performed each refueling outage except under special circumstances when on-line testing was performed. The test data accumulated over a 16 year period consists of 24 electrical trips on the two RT breakers each year. In that period, no failures were recorded. This indicates a high system availability. In addition, during the 1985 refueling outage, acceptance testing was performed which verified the independent operation of both the Undervoltage Trip Attachment (UVTA) and the Shunt Trip Attachment (STA) on each RT breaker. This independent operation testing and trending of parameters resulted in 46 additional electrical tests. The additional tests provide more reliability data but, more importantly, the trending will provide clear indications of impending component failure or "wear out" sufficiently in advance of any failure to permit repair or replacement. Based on the historical data, which is presented more fully in the attached Design Analysis addressing the Reactor Trip System Reliability, there is no need to change the RT breaker test interval. Decreasing the Reactor Trip System test intervals will not provide sufficiently greater system reliability to justify the potential added risks of spurious plant trips and increased challenges to safety systems.

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DATE: November 19, 1985

Provision of Testing Features

From the conclusions reached in the SER, the existence of test features necessary to perform independent testing apparently was not clear from the drawings provided by RG&E. The Staff concluded that since Ginna does not have test switches, on-line testing could not be performed to independently verify the operability of both the STA and the UVTAs. However, independent testing can be performed. Test switches can be used to directly trip the Shunt Trip Attachment independent from the Undervoltage Attachments. Circuitry associated with the zirconium guide tube logic, a unique feature of the Ginna Reactor Protection System (RPS), is used to operate the UVTA independently from the STA. The zirconium guide tube logic circuitry is not required for reactor protection but assures that the control rods are not engaged in the grippers during plant cooldown when different materials may experience different thermal contraction rates. Interrupting the zirconium guide tube circuitry causes a RT trip using only the UVTA coil. Additional switches will be added to this circuitry during the 1986 outage to further facilitate this independent testing. Following modification of the RT breaker logic during the 1985 outage to meet the requirements of Section 4.3 of Generic Letter 83-28, independent testing of the trip coils was performed using plant procedures. In addition, Ginna Station procedure PT-32.0 has been modified to include the on-line testing requirements requested by your letter of August 19, 1985.

Bypass Breaker Position Indication

Included with the SER was the Staff's position on Reactor Trip Bypass Breaker Position Indication. This document established a requirement for separate breaker position indicating lights for each bypass breaker position. The Staff requires that such lights be provided by the end of the 1986 refueling outage. Ginna does not have indicating lights, however it does have a dedicated annunciator position which alerts the operator that a bypass breaker is closed. RG&E will also modify the control circuitry associated with the two bypass breaker positions to provide direct red and green light indication on the Main Control Board. Auxiliary position switches will be interlocked with appropriate cell switches to provide the required indication during the 1986 refueling outage. The Staff's position on this subject was not included in generic letter 83-28 and therefore, was not part of RG&E's initial response. The requirement was stated by the NRC Staff reviewers in telephone discussions related to the RG&E submittal, and documented in the position document attached to the SER.

Bypass Breaker Interlocks

The Staff's position requires that the two bypass breakers be interlocked with cell switches such that only one can be closed at a time. This requirement also was not part of the generic letter

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TO: Mr. John A. Zwolinski

DATE: November 19, 1985

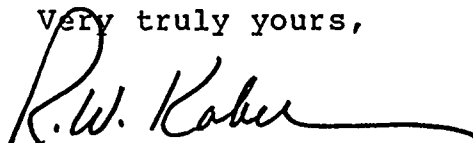
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and consequently, not part of RG&E's original response. These interlocks will be provided consistent with the Staff's requirement during the 1986 outage, even though Ginna has only one bypass breaker. The control schematics associated with the RT breakers will be modified to include the bypass breaker position indication and the interlocks.

Revisions to the Ginna Station Technical Specification are not proposed at this time, consistent with the Design Analysis for on-line testing.

Very truly yours,

A handwritten signature in cursive script, reading "R. W. Kober", followed by a horizontal line extending to the right.

R. W. Kober

