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

SUBJECT: Discusses activities necessary to resolve NUREG-0737, Item  
 III.D.3.4, "Control Room Habitability," per 840307 ltr.  
 Completion of mods delayed until 840930 due to design  
 info delays, contractor strike & organizational changes.

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NOTES: NRR/DL/SEP 1cy. 05000244  
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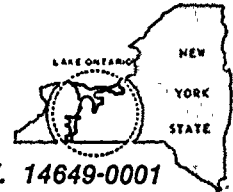
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ROGER W. KOBER  
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July 20, 1984

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

Subject: NUREG 0737, Item II.D.3.4  
R. E. Ginna Nuclear Power Plant  
Docket No. 50-244

Dear Mr. Paulson:

In a letter dated March 7, 1984, RG&E summarized the activities necessary to resolve NUREG-0737, Item III.D.3.4, Control Room Habitability. The activities included installation of new radiation and toxic gas monitors, installation of redundant dampers, measurement and confirmation of acceptable residence time in the charcoal filter and relocation of the ammonia tank. RG&E also committed, based upon the availability of engineering and construction manpower, to complete the work by July 1, 1984 or one year after the NRC Safety Evaluation, whichever was later. An NRC confirmatory order covering many NUREG-0737 topics was issued March 14, 1983 which listed Control Room Habitability to be completed during July 1984. The NRC safety evaluation was issued April 11, 1983.

RG&E has determined, largely due to circumstances beyond the company's control, that some of the equipment necessary to meet control room habitability commitments may not be operable until the end of September 1984. A new ammonia tank designed to use dilute ammonia has been installed in a new location to reduce the potential ammonia concentration at the control building HVAC intake. The old tank, which contained anhydrous ammonia, is scheduled to be emptied by the end of July. If for any reason it becomes necessary to use the old ammonia tank at any time in the future, the control building air intake dampers will be closed so that a potential release of ammonia will not present a hazard to the control room operators.

It may be necessary during such times to periodically open the dampers for fresh air makeup for short periods of time (i.e., less than about 1 hour) in order to improve the working environment in the control room for the operators. The reason for this is that ammonia is required for about 24 hours to accomplish

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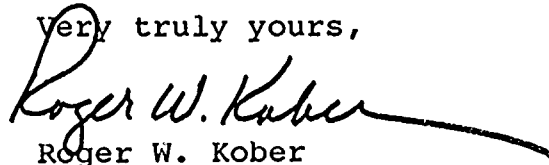
TO Mr. Walter A. Paulson

condensate demineralizer resin regeneration, but experience has shown that fresh air makeup to the control room is desirable every 8 to 16 hours. During the fresh air makeup, all reasonable efforts will be made to limit handling of the anhydrous ammonia. In particular, any transfer between the delivery truck and the tank will be suspended.

Redundant dampers have been installed in the control room ductwork and acceptable charcoal filter residence times have been considered in the modification of the recirculation system for the control room. New radiation and toxic gas detectors have been procured and the analyzer cabinets will be installed by July 31. However, detector operation to automatically isolate the redundant control room dampers is not yet available. Vendor interface difficulties between the equipment supplier and another design organization resulted in delays in producing design documents to begin construction. A contractor strike which occurred from May 31 through July 2, 1984 further delayed installation of piping necessary to draw intake air samples from the ducting to the detector cabinets. RG&E also recently rebid our construction services contract and the resulting organizational changes may require additional time to orient new people to the current tasks during a short transitional period. System testing remains to be performed after completing the installation although test specifications have been prepared.

The original schedule proposed for design, procurement and installation included a contingency for unforeseen events but did not anticipate that design information delays, a contractor strike and organizational changes would all affect this modification near its completion. Nevertheless, an extension of the schedule by 60 days should assure satisfactory installation and startup testing for this system. In the interim period, removal of the ammonia from the old storage tank will provide a significant reduction in on-site toxic gas hazards. Manual operator action or automatic action by the existing radiation monitor will provide protection for most postulated events. Completion of the modifications to provide protection for all events will be accomplished by September 30, 1984. RG&E requests that the existing order dated March 4, 1983 be modified to reflect the revised completion date based upon the significant protection already provided and action to remove anhydrous ammonia as a major contributor to on-site hazards.

Very truly yours,



Roger W. Kober

Subscribed and sworn to before me

on this 20th day of July, 1984.

  
WILLIS L. SCHULZE

NOTARY PUBLIC, State of N.Y., Monroe County

My Commission Expires March 30, 1985

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