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 FACIL: 50-244 Robert Emmet Ginna Nuclear Plant, Unit 1, Rochester, G. 05000244
 AUTH. NAME: MAIER, J. E. AUTHOR AFFILIATION: Rochester Gas & Electric Corp.
 RECIP. NAME: CRUTCHFIELD, D. RECIPIENT AFFILIATION: Operating Reactors Branch 5.

SUBJECT: Addresses Tech Spec requirement for tendon insp resulting from tendon 75 damage during Jul surveillance. Reasons why exemption from requirement should be granted listed. No broken wires identified.

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December 1, 1983

JOHN E. MAIER
Vice President

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

Subject: Containment Vessel Evaluation Program
R. E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Crutchfield:

This letter addresses the Ginna Technical Specification requirements for tendon inspection resulting from the damage to tendon no. 75 which occurred during the July Tendon Surveillance. In our letter dated November 21, 1983, we reported that prior to the incident, 12 tendons had been inspected and tested including no. 75. The inspection of each tendon revealed no broken wires and no other anomalies. Furthermore, lift-off tests showed that all tendon forces exceeded the technical specification minimum requirement of 636 Kips, as well as showing excellent agreement with pretest predictions.

An inspection conducted after the incident revealed that 24 of 90, 1/4-inch diameter steel wires in tendon no. 75 were broken. Section 4.4.4.1 (d) of the Technical Specifications requires that all 160 tendons be inspected if more than 20 wires in 14 tendons are found broken since the last surveillance inspection.

We request that Ginna be granted an exemption from this requirement for the following reasons:

- (1) The initial inspection of tendon no. 75 and the other 11 tendons revealed no broken wires prior to the incident.
- (2) The cause of the broken wires is attributable to the stressing equipment failure and not due to an unexplainable loss of tendon integrity.
- (3) Adherence to the technical specifications would involve degreasing the tendon heads prior to conducting an inspection. Due to ambient temperatures this time of year, the casing filler covering the tendon heads is a stiff, putty-like substance making degreasing operations a time-consuming ordeal. It will require approximately 30 days or roughly 200 manhours to complete this task.

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This last, approximately 30 days or roughly 500 manhours to complete operations a time-consuming ordeal. It will require a staff, twenty-five manhours making degreasing of 400, the casing filter covering the London heads inspection. One to ambient temperatures this time degreasing the London heads prior to conduct this last.

- (4) Subsequent visual inspection of the four adjacent tendons in accordance with Technical Specification 4.4.4.1 (e) revealed no broken wires.
- (5) Subsequent lift-off testing of two of the four adjacent tendons yielded lift-off forces of 701 kips and 724 kips. Although predictions are not available for these tendons; the results are within the range of other tendon forces; thus indicating that no significant change in lift-off force occurred in adjacent tendons.

Subsequent to realigning and detensioning tendon no. 75; it was retensioned to a force equalling .70 GUTS (+ 5%) of the remaining 66 effective wires. This force value is equivalent to 532 Kips which is less than the minimum technical specification requirement of 636 Kips. However; the adjacent four tendons, two on each side of no. 75; contribute adequate structural support in this region of the containment. The minimum design requirement in terms of vertical membrane stress resultant is 636 Kips/2.13 ft. (where 2.13 ft. is the tendon spacing) or 299 Kips per foot. Based upon calculated average forces of the adjacent tendons; the combined effect of the five tendons produce a stress resultant totalling 315 Kips per foot. Therefore; the structural integrity in this region of the containment is maintained. Further analysis is in progress to further refine a minimum required force for tendon no. 75.

Based on the fact that the cause of the broken wires on tendon no. 75 is known; that no other broken wires were found in the other 17 tendons which were originally part of the surveillance program or in the 4 adjacent tendons; that two adjacent tendons were tested for lift-off force and showed no unusual results; and that average force in the vicinity of tendon no. 75 remains acceptable; we request a one-time exemption from the requirements for visual inspection in Technical Specification 4.4.4.1 (d).

Very truly yours;



J. E. Maier

