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 CRUTCHFIELD,D. Operating Reactors Branch 5

SUBJECT: Forwards "App R Alternative Shutdown Sys." New shutdown approach provides fewer mods & allows phased implementation as opposed to required dedicated shutdown sys.

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January 16, 1984

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: 10 CFR Part 50 Appendix R, Alternative Shutdown System
R. E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Crutchfield:

After the issuance of Appendix R to 10 CFR 50 in November 1980, RG&E committed to install a dedicated shutdown system as the means of achieving compliance with Section III.G of the regulation. At the time that Appendix R was issued, RG&E was also participating in the Systematic Evaluation Program (SEP) and evaluating systems required for safe shutdown. In the limited time allowed to respond under 10 CFR 50.48 and based on analyses previously undertaken and completed, a dedicated shutdown system appeared to offer the most prudent compliance option to resolve both SEP and fire protection topics.

As the SEP Integrated Assessment took place, it became evident that the dedicated shutdown system was unnecessary for SEP Topic resolution. It also became evident during the design process for the dedicated shutdown system that the complexity of the system, the impact upon safety related equipment during construction and testing and the magnitude of the modifications required were all greater than had been expected during the initial conceptual design. For these reasons and due to the escalating cost estimates for the dedicated shutdown system, it was decided to reanalyze the Ginna Plant to evaluate alternative means of meeting Appendix R requirements. As a result, a new alternative shutdown approach was defined during 1983. This approach provides for fewer plant modifications and allows for phased implementation as opposed to the dedicated shutdown system which required that all modifications be completed before it could be placed in service. The new alternative approach provides a more timely and cost effective method of conformance to Appendix R

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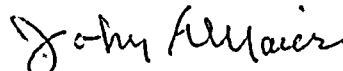
TO Mr. Dennis M. Crutchfield

and also incorporates the Commission guidance that has evolved since the previous RG&E dedicated shutdown system submittals.

A detailed description of the new alternative shutdown approach, based on the reanalysis performed in 1983, is enclosed with this letter. The approach combines local safe shutdown system control capability; limited upgrading of fire area boundaries; installation of one- and three-hour-equivalent protection of selected safe shutdown power, control and instrumentation circuits; and limited exemption requests where existing plant features or proposed modifications provide a level of fire protection deemed commensurate with that required by the regulation. This approach provides for safe cold shutdown capability as did the earlier dedicated shutdown system. However, due to the significantly reduced number of modifications, conformance will be achieved in a shorter timeframe, in a more cost effective manner, and in a fashion which will result in less impact on plant operations and systems both during and subsequent to installation.

RG&E has recognized from the time that Appendix R was issued that the schedular requirements for compliance would be unattainable. Requests for schedular exemptions were submitted November 17, 1982 and December 27, 1983. The most recent request committed to provide the information contained in the enclosed report. This information is substantially the same as that discussed with the NRC Staff in meetings on June 7, 1983 and October 27, 1983. RG&E has attempted to meet NRC guidance in developing the alternative shutdown system and the enclosed report is similar in format and content to other reports that the NRC staff has reviewed. RG&E requests that review of this report be completed and that your written concurrence be provided as quickly as possible. In the meantime, RG&E will actively work to implement the alternative shutdown system described in the enclosed report in a timely fashion. RG&E staff will be available at your convenience to discuss either the schedular exemption request or the revised alternative shutdown approach.

Very truly yours,



John E. Maier

Enclosure

