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AUTH.NAME AUTHOR AFFILIATION
MAIER,J.E. Rochester Gas & Electric Corp.
RECIP.NAME RECIPIENT AFFILIATION
CRUTCHFIELD,D. Operating Reactors Branch 5

SUBJECT: Responds to 10CFR50.48 & App R to 10CFR50 re potential mods resulting from fire protection safe shutdown study.Mods to resolve all outstanding SEP issues,including fire protection,will be proposed during Apr 1983.

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REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:9211250483 DOC.DATE: 92/11/17 NOTARIZED: NO DOCKET #
FACIL:50-244 Robert Emmet Ginna Nuclear Plant, Unit 1, Rochester G 05000244
AUTH.NAME AUTHOR AFFILIATION
FITZPATRICK,J. Rochester Gas & Electric Corp.
RECIP.NAME RECIPIENT AFFILIATION
DIRSTINE,R.W. Region 1, Office of Enforcement

SUBJECT: Responds to Notice of Violation re inspection on 921001. Corrective action: Fire protection safe shutdown study.Lack of procedure to delineate fire protection equipment. Fire protection will be performed during 1993.

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JOHN E. MAIER
Vice President

TELEPHONE
AREA CODE 716 546-2700

November 17, 1982

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 50.48, Fire Protection
R. E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Crutchfield:

In response to 10 CFR 50.48 and Appendix R to 10 CFR Part 50, Rochester Gas and Electric submitted reports on March 19 and May 19, 1981 which described potential modifications at the R. E. Ginna Nuclear Power Plant. The potential modifications were the result of a fire protection safe shutdown study submitted December 28, 1979 and engineering design work. Additional information concerning safe shutdown of the plant was submitted October 16, 1981 and July 28, 1982.

Our continued review and engineering of the fire protection modifications leads us to request an exemption from the requirements of 10 CFR 50.48 for several reasons. The modifications proposed in our referenced submittals were modifications which are designed to respond to fire protection issues only. It is imperative, as we have stated in our previous submittals, that fire protection modifications be integrated with modifications from the Systematic Evaluation Program. For example, the dedicated shutdown system proposed for fire protection includes a new enclosure with new HVAC and new power and control circuits for one service water pump. Modifications resulting from SEP review may eliminate the need for these service water modifications by providing alternative means of cooling the diesels and supplying water to the auxiliary feedwater and component cooling water systems.

Integration of SEP modifications is expected to be completed by April of this coming year. Including fire protection requirements with those requirements from other topics will result in a better plan for upgrading Ginna Station.

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The cost of the dedicated shutdown system proposed for fire protection has increased significantly since it was first proposed. The first estimates were that the system would cost several million

dollars; the current estimates, still based on only conceptual engineering, are that the system will cost in excess of $20 million dollars. The estimates have been made prior to doing cable routing for the large number of circuits involved in this system. The congestion in many areas of the plant and restrictions placed on cable routings to avoid some fire zones, leads us to believe that the estimates will increase further as engineering progresses.

The benefits to be derived from the dedicated shutdown system are difficult to quantify. Over 14 million dollars have already been spent to improve our detection and suppression capabilities and the dedicated shutdown system is based upon the very conservative assumption that no detection, no automatic supression and no fire brigade suppression is effective in controlling or limiting fire damage. It is not clear that such a substantial increase in public health and safety will be realized to justify installation of the currently proposed system based upon fire protection alone.

Therefore, adequate reason exists for a schedular exemption from the dedicated shutdown requirements of 10 CFR 50.48 until a comprehensive modification plan for Ginna is agreed upon by RG&E and the NRC Staff. Modifications to resolve all the outstanding SEP issues, including fire protection, will be proposed in April 1983. Upon reaching agreement on the modifications to be installed, a schedule for installation will be developed.

Very truly yours,

John E. Maier

John E. Maier