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 FACIL: 50-244 Robert Emmet Ginna Nuclear Plant, Unit 1, Rochester G 05000244  
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 RECIP. NAME: CRUTCHFIELD, D. RECIPIENT AFFILIATION: Operating Reactors Branch 5

SUBJECT: Describes cable penetration mod to be performed during  
 spring refueling outage scheduled for late Mar 1983. No Tech  
 Spec mod required.

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February 18, 1983

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: Cable Penetration Modification  
R. E. Ginna Nuclear Power Plant  
Docket No. 50-244

Dear Mr. Crutchfield:

During the spring refueling outage scheduled to begin in late March 1983, as in past outages, an extensive inspection and maintenance program will be performed in the steam generators. These efforts require various power and instrumentation cables to be run through the personnel doors of the equipment hatch allowing the control of some maintenance activities from outside containment thereby reducing occupational exposure. In past outages, refueling and work requiring these cables could not be performed simultaneously because there was no means to provide during refueling containment integrity without closing personnel doors, thereby requiring removal of the cables.

For the spring 1983 refueling outage, a containment closure device will be fabricated to provide a containment isolation barrier during refueling activities. The closure device will include pipe sleeves capable of housing required cable and hose in an airtight configuration when the containment environment is at atmospheric pressure. Both doors of the equipment hatch will be opened and the closure device will be mounted to the equipment hatch outside door framing. The closure device will only be used during refueling conditions. By using this closure device during refueling outages, we will be able to perform refueling operations simultaneous with steam generator inspection and repair, thus reducing outage critical path time.

We have reviewed the events analyzed in the Ginna Station FSAR and the events requiring analysis by NRC Regulatory Guide

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DATE February 18, 1983

TO Mr. Dennis M. Crutchfield

1.70. Since the RCS temperature ( $<140^{\circ}\text{F}$ ) and core reactivity conditions ( $>10\%$  k/k subcritical) during refueling do not provide the potential energy to pressurize containment, the airtight closure device is sufficient to prevent the spread outside containment of radioactivity released from a fuel assembly damaged during refueling. Therefore the health and safety of the public would not be threatened by use of this closure device.

The closure device will satisfy the requirement of Section 3.8.1 of the Ginna Station Technical Specifications that during refueling operations at least one door in each personnel air lock be properly closed. We do not anticipate making any change to our Technical Specifications due to the use of this device.

This letter is provided for your information.

Very truly yours,

  
J. E. Maier

There is a very good reason for this.  
The first is the fact that the