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SUBJECT: Responds to issues raised by NRC 811230 ltr & Franklin Research Ctr technical evaluation rept,TER-5257-429 re SEP Topic III-1, "Quality Group Classification of Components & Sys." Remaining issues will be addressed before end of 1982.

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June 25, 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: SEP Topic III-1, Quality Group Classification of Components and Systems
R. E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Crutchfield:

The NRC provided RG&E with a Safety Evaluation Report regarding this topic, by letter dated December 30, 1981. Also included was a Franklin Research Center Technical Evaluation Report TER-5257-429. Additionally, this topic was addressed in Section 4.7 of the draft SEP Integrated Plant Safety Assessment (NUREG-0821), May 1982.

The attachment to this letter responds to a number of the issues raised. The remaining issues will be addressed at a future date, expected to be before the end of 1982.

Very truly yours,

John E. Maier

John E. Maier

Attachment

A035

Attachment: Resolution of Certain Items Noted in 12/30/81 SER Regarding SEP Topic III-1, Classification

1. In Section V.1 of the December 30, 1981, SER it is noted that for 38 of 77 components, insufficient information is provided to define exemption from fracture toughness requirements. RG&E has reviewed Table 5-1 of the FRC TER, and is providing the following additional information.

Component	Reason for Exemption[1]
Pressurizer Relief Tank	This tank is not safety-related; is not required to meet code requirements
Nitrogen Supply to Accumulators	8d (pipes, fittings, pumps, and valves, with nominal pipe size of 6 inch diameter or less)
Piping and Valves to CSS Pumps from RWST	8a (thickness < 5/8")
Spray Additive Tank Piping	8d
Interconnnecting Piping and Valves from CSS Pump Discharge to CSS Spray Nozzles	8d
Non-Regenerative Heat Exchanger - Shell Side	8a
Charging Pump Accumulators	8e (austenitic stainless steel)
Excess Letdown Heat Exchanger - Shell Side	8a
Seal Water Heat Exchanger - Shell Side	8a
Deborating Demineralizer	Non Safety-Related
Valves in Piping (Loop A) Line Via Excess Letdown Heat Exchaner To and Including Valve HCV 133	8d

(1) The reasons for exemption (e.g., 8a, 8d) are those used in FRC Report TER-5257-429 which addressed this SEP Topic

Component	Reason for Exemption
Valves in Charging Line from Pump Discharge to Containment Isolation Valve	8d
Valves in Remainder of Interconnecting Piping and Valves	8d
Valves from TCV145 Via Demineralizer to Valves 1106 and 1107	8d
Valves from BAT Via Boric Acid Transfer Pump and Filter	8d
Main Steam Safety Valves	8d
Piping and Valves from Main Steam Line to AFW Pump Turbine	8d
Auxiliary Feedwater Pumps - Motor Driven	8d
Auxiliary Feedwater Pump - Turbine Driven	8d
Condensate Storage Tanks	Not Safety-Related
Piping and Valves from Pump Discharge to Valves 4000 C, D	8d
Piping and Valves from Pump Discharge to 4003, 4004	8d
Piping and Valves to Suction of AFW Pumps	8d
Turbine Driven Pump Lube Oil Tank, Pumps, and Piping	8a and 8d
Containment Isolation System	CI System included in above systems

2. In Section V.2 of the December 30 SER, it was noted that information regarding Category C welds was required for certain pressure vessels.

a. It should be noted that the regenerative heat exchanger and the excess letdown heat exchanger (tube side) were originally specified as Class A vessels, rather than Class C vessels. These will be discussed below.

b. The non-regenerative heat exchanger, the RHR heat exchangers, and the seal water heat exchanger are Class 2 vessels on the tube side only. Thus, no Category C weld requirements apply to the Class 2 portions of these heat exchangers.

c. Although the accumulators, volume control tank, reactor coolant filter, seal water injection filter and the charging pump accumulator are Class 2 components, their failure would not result in the release of significant amounts of radiation. The failure of the volume control tank was analyzed in the Section 14.2.3 of FSAR as a Design Basis Accident. The radiological consequences of this failure were well within the guidelines of 10CFR 100. Thus, it is not considered that failures of any of these welds would be of safety significance, and that therefore no additional radiography is required.

d. It was noted in the Ginna FSAR that the regenerative heat exchanger and the excess letdown heat exchanger were considered Class C vessels. However, the equipment specifications for these items actually specified the heat exchanger and the tube side of the excess letdown heat exchanger as Class A vessels. Thus, the fatigue analysis and radiography requirement deficiencies for these vessels do not apply.

3. In Section V.5 of the December 30, 1981 SER, RG&E was requested to provide the below-listed information relative to the design of the Refueling Water Storage Tank, Boric Acid Tanks, CVCS Holdup Tanks, CCW Surge Tank, AFW Condensate Storage Tank, and Turbine Driven AFW Lube Oil Tank.

a. Confirm that the atmospheric storage tanks meet current compressive stress requirements.

This evaluation will be performed in conjunction with the seismic analysis being performed on these tanks, as required by resolution of SEP Topic III-6, Seismic Design Considerations. Note that the evaluation will not be performed for the Condensate Storage Tank (CST) and the Turbine Driven AFW Lube Oil Tank, since they are not required to perform a safety function. Both the CST, which provides suction to the AFW System, and the Turbine Driven Auxiliary Feedwater pump, have functions which can be performed by other safety-related systems (the Service Water System and the Standby Auxiliary Feedwater System, respectively).

b. Confirm that the 0-15 psig storage tanks meet current tensile allowables for biaxial stress field conditions.

RG&E will also provide this information in conjunction with the seismic analyses being performed, for the four tanks listed in 3a above.

c. Provide the codes or requirements to which Refueling Water Storage Tank, Condensate Storage Tanks, and Turbine Driven AFW Lube Oil Tank were designed.

The analysis of the RWST is being performed to current regulatory seismic criteria. Modifications resulting from this analysis will be performed to ensure that the RWST is acceptable. Current code requirements will be considered in the evaluation of these modifications. As noted in 3a and 3b above, the Condensate Storage Tanks and the Turbine Driven AFW Lube Oil Tank are not required to perform a safety function. No additional information is thus required to be submitted.

4. In Section V.4 of the December 30, 1981 SER, it was requested that RG&E provide the codes and requirements to which the Gas Stripper Pumps, Service Water Pumps, and Lube Oil Pumps for the Turbine Driven AFW pump bearings were designed.

RG&E is evaluating the Service Water Pumps as part of SEP Topic III-6. This analysis is being performed to current seismic criteria. Modifications resulting from this analysis will be performed to ensure that the Service Water Pumps are acceptable. Current code requirements will be considered in the evaluation of these modifications. The gas stripper pumps are not safety-related. Thus, no additional evaluation of the requirements for these pumps are considered necessary. Also, as noted in paragraph 3 above, the turbine driven auxiliary feedwater pump, and its auxiliaries, perform safety functions which can be performed by other safety-related pumps, such as the Standby Auxiliary Feedwater Pumps.

5. In Section V.7 of the December 30, 1981 SER, RG&E was asked to confirm the assumption used in FRC's temperature loading calculations, that the temperature drop from 100% power to 0% power is comparable to that of the Palisades Plant (64°F). For the Ginna Plant, the temperature drop is 602.5 - 547 = 55.5°F.