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ACCESSION# NBR: 8112020435. DOC. DATE: 81/11/25 NOTARIZED: NO DOCKET# #
 FACIL: 50-244 Robert Emmet Ginna Nuclear Plant, Unit 1, Rochester G. 05000244
 AUTH. NAME: AUTH. AFFILIATION
 ARTHUR, J. E. Rochester Gas & Electric Corp.
 RECIP. NAME: RECIPIENT AFFILIATION
 CRUTCHFIELD, D. Operating Reactors Branch 5.

SUBJECT: Submits status of implementation of Nureg-0737 requirements:
 Items II.B.2 & II.F.1.6 re: plant shielding & containment
 hydrogen monitoring sys, respectively. Implementation will not
 be completed by 820101 as required.

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 TITLE: Response to NUREG-0737/NUREG-0660. TMI Action Plan Rmpts (OL's)

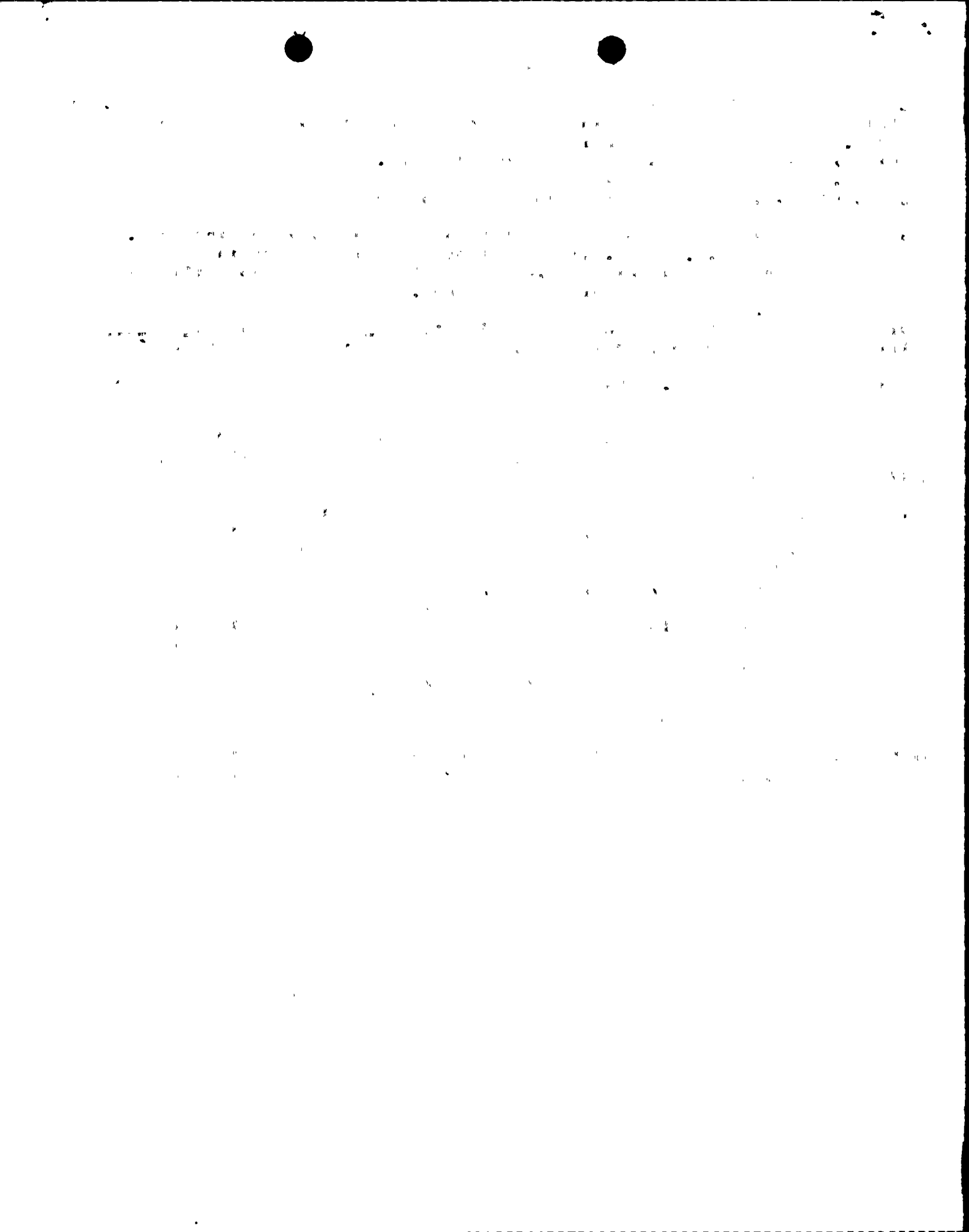
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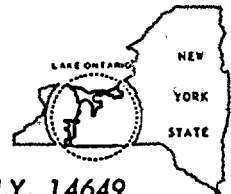




ROCHESTER GAS AND ELECTRIC CORPORATION • 89 EAST AVENUE, ROCHESTER, N.Y. 14649

JOHN ARTHUR
Vice President and Chief Engineer

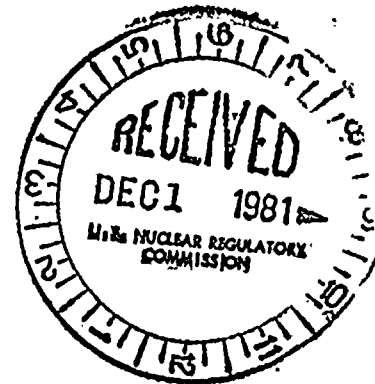
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November 25, 1981

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: Status of NUREG-0737
Items II.B.2 and II.F.1
R.E. Ginna Nuclear Power Plant
Docket No. 50-244



Dear Mr. Crutchfield:

NUREG 0737 requires the implementation of many modifications to operating nuclear power plants, several of which are required by January 1, 1982. Much of the required work has been completed. Two of the items which we have previously committed to have completed by the required date (II.B.2 and II.F.1.6) will not be finished by January 1, 1982.

We have previously informed you of other plant modifications which will be delayed. Those modifications are a new radwaste panel, the post accident sampling system and the reactor vessel level monitor. Our schedules for these systems are contained in our letters dated December 15, 1980 and September 4, 1981. In addition, the containment high range radiation monitors, although installed and to be operable by the end of the year, will be modified during the coming Spring refueling outage to assure proper post accident environmental qualification.

The containment hydrogen monitoring system, item II.F.1.6, will be delayed by about three months from its original schedule. The hydrogen monitors have been delivered to the site. However, because of questions surrounding the qualification of this state-of-the-art technology, both the engineering and construction schedules are longer than had originally been anticipated. The engineering schedule expanded from three months to eight months and, based upon the revised engineering of the system, the construction will take 3 months instead of the anticipated one month. Installation of the monitors will require longer sample lines, more electrical cable and more structural support than was anticipated when we originally agreed to meet the NRC established date and planned our engineering and construction schedule. We

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DATE November 25, 1981

TO Mr. Dennis M. Crutchfield

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began our engineering in the Spring of 1981 which should have allowed adequate time to complete the modification. Some of the electrical cable, two of the required valves, and the data recorder are not expected to be delivered to the site until late December, 1981. We believe that installation of the hydrogen monitor can be completed by March 31, 1982, but since our annual refueling outage and overhaul is scheduled to begin between March 19 and April 1, 1982 we request that the implementation date be moved to the end of the refueling outage.

Portions of the plant shielding, item II.B.2, will be delayed beyond January 1, 1982. The additional plant shielding required after TMI involved completion of 5 separate tasks: floor reinforcing to support the count room wall shielding, count room wall shielding, vertical shield wall extension at the sample line containment penetration area, shield wall end closure door at the sample line containment penetration area and waste gas vent header shielding. The first three of these tasks will be completed on time; the last two will not be completed until March 1, 1982.

The primary reason for delay of the latter two tasks has been changes in the design. Our decision to install a post accident sampling system (PASS), described in our letter dated September 4, 1981, has affected both tasks.

The original conceptual design for shielding of the vent header was to install a solid lead casing around the existing piping. Substantial difficulties were encountered during engineering of this shielding, both in placing or constructing the shielding in restricted spaces, and in providing the support necessary for the shielding. The final design of the modification has rerouted much of the vent header piping behind existing shield walls and some of the piping will be shielded with a different shield concept. The shield will consist of a structural casing filled with lead shot rather than a solid lead shield.

The door to be installed is a one ton swinging lead and steel closure to be mounted on hinges. Several alternatives have been considered for this closure, including vault doors, and it has now been determined that a specially constructed door is required. Materials for construction of the door should be delivered by the end of the year, making fabrication and installation possible by March 1, 1982. However, potential problems with door hardware delivery may delay installation until sometime during the refueling outage.

The delay of the hydrogen monitor installation and two parts of the shielding installation will not prevent the performance of any required post accident functions. Existing equipment and procedures can be used to quantify the containment hydrogen



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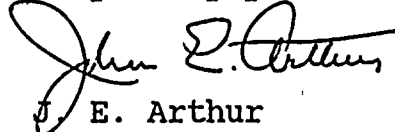
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content by sampling and sample analysis. Installation of the door and vent header shielding and pipe reroute are measures which are prudent to reduce post accident personnel exposures but which are not absolutely required. The shielded door and the vent header modifications will reduce exposures to personnel entering the auxiliary building and will allow earlier access to safeguards bus 16 and its motor control centers as described in our December 28, 1979 submittal. No specific actions at the bus 16 area which require operator action have been identified, however, and other actions in the auxiliary building can be carried out without the modifications. Therefore, continued operation until the modifications can be completed in the first several months of 1982 is justified.

Very truly yours,


J. E. Arthur