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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 810211 ltr re environ qualification of safety-related electrical equipment. Meeting w/NRC following receipt of final rept from Franklin Research Ctr suggested. Comments on interim rept encl.

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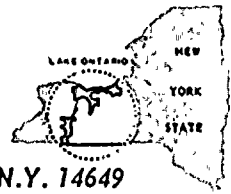
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JOHN E. MAIER
VICE PRESIDENT

TELEPHONE
AREA CODE 716 546-2700



February 20, 1981

Director of Nuclear Reactor Regulation
ATTN: Mr. Dennis M. Crutchfield, Chief
Operating Reactors Branch #5
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Environmental Qualification of Safety-related
Electrical Equipment
R. E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Crutchfield:

This letter is in response to a letter of February 11, 1981 (received on February 13) from Mr. Gus C. Lainas, Assistant Director for Safety Assessment in the Office of Nuclear Reactor Regulation, concerning the environmental qualification of electrical equipment at the R. E. Ginna Nuclear Power Plant. In that letter, Mr. Lainas requested that RG&E review the deficiencies identified in the "Partial Review, Equipment Evaluation Report by the Office of Nuclear Reactor Regulation" ("Partial Review") for the Ginna plant, together with the ramifications of those deficiencies, and provide an overall finding regarding the continued safe operation of the facility.

After reviewing this matter with responsible Company personnel, I can state that there is no aspect of the environmental qualification of safety-related electrical equipment at the Ginna plant which would interfere with the safe, continued operation of the Ginna plant. The bases for acceptability of the Ginna equipment were provided in the October 31, 1980 RG&E report concerning "Environmental Qualification of Electrical Equipment," and my subsequent letter of December 15, 1980 addressed to you.

In concluding that our above-referenced submittals provide an adequate basis for determining that Ginna can continue to operate safely, we took into account the preliminary list of deficiencies in the Partial Review. Our evaluation of the latter document would have been aided, however, by a statement of the factual basis underlying each identified deficiency. Many of these deficiencies were specifically addressed in our October 31, 1980 submittal, but Mr. Lainas' February 11, 1981 letter and the Partial Review make no reference to them. We also note with some

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DATE February 20, 1981

TO Mr. Dennis M. Crutchfield, Chief

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concern the fact that there are a number of discrepancies between Franklin Research Center's Draft Interim Technical Evaluation Report, FRC Project C5257, dated August 20, 1980, and the Partial Review. We have not, as yet, received the final Technical Evaluation Report from the Franklin Research Center and thus are unable to evaluate fully the significance and validity of these discrepancies. In addition, RG&E is concerned about the novel approach being employed by the staff to ensure margin requirements for containment temperature, as stated in paragraph 3.3 of the Partial Review. Comments concerning this approach are provided in the attachment.

RG&E has made every effort to ensure compliance with the June 30, 1982 deadline for achieving environmental qualification for our electrical equipment at the Ginna plant. However, it must be recognized that delays in our receiving the full Technical Evaluation Report may seriously jeopardize our ability to meet the June 30, 1982 deadline. RG&E requests a meeting with representatives of the Nuclear Regulatory Commission to discuss these matters. I would suggest, however, that such a meeting would be productive only after we have received and reviewed Franklin Research Center's final Technical Evaluation Report together with a detailed description of the bases for the conclusion reached in Appendices B and C of the Partial Review.

Very truly yours,

John E. Maier

Attachment

STATE OF NEW YORK :
COUNTY OF MONROE : SS.

Subscribed and sworn to before me on
this 20th day of February, 1981.

Gary L. Reiss
GARY L. REISS

NOTARY PUBLIC, State of N. Y. Monroe Co.
My Commission Expires March 30, 1981

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Attachment

In Section 3.3 of the "Partial Review", it is stated that ". . . the minimum temperature profile for equipment qualification purposes should include a margin to account for higher than average temperatures in the upper regions of the containment that can exist due to stratification especially following a postulated MSLB. Use of the steam saturation temperature corresponding to the total building pressure (partial pressure of steam plus partial pressure of air) versus time until the sprays become effective will provide an acceptable margin for either a postulated LOCA or MSLB, whichever is controlling as to potential adverse environmental effects on equipment."

RG&E has serious reservations concerning both the method of imposition of this new requirement, and its technical validity.

- a) The purpose of the October 31, 1980 RG&E submittal was to respond to the September 19, 1980 Commission Order, requiring submittal of information to show compliance with the "DOR Guidelines". The "DOR Guidelines" explicitly state that in Section 4.2.1 that ". . . equipment qualified for a LOCA environment is considered qualified for a MSLB accident environment in plant with automatic spray systems not subject to disabling single component failures." In Appendix A of FRC Project C5257, it is stated that ". . . the design of the Ginna plant satisfies these criteria. We consider it inappropriate that the staff would modify explicit previous guidance via this "Partial Review". The requirement to meet a 307°F temperature envelope is obviously beyond the requirements of the "DOR Guidelines".
- b) The apparent reason for this new requirement is to provide margin to account for higher than average temperatures in the upper regions of containment due to potential stratification. RG&E does not have any safety-related electrical equipment in this area of containment. Therefore, the basis for the staff concern does not apply to the Ginna plant.
- c) Since it is not conceivable that all the air in containment would be expelled after a LOCA or MSLB, it does not appear reasonable to determine margin in this manner. The criteria of IEEE-323-1974, together with the margin inherent in the analyses arriving at containment conditions, serve as ample assurance of the determination of conservative environmental conditions.

It is requested that the above concerns be addressed by the staff in making a determination of the required environmental conditions for the Ginna plant.