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 RECIP. NAME: CRUTCHFIELD, D. RECIPIENT AFFILIATION: Operating Reactors Branch 5

SUBJECT: Forwards "Safe-Shutdown Capability Assessment & Proposed
 Mods - 10CFR50, App R - Ginna Unit 1," per revised NRC
 criteria. Review of fire protection items should include
 integrated approach. SEE Rpts. # 8103200598

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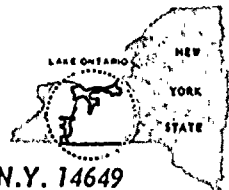
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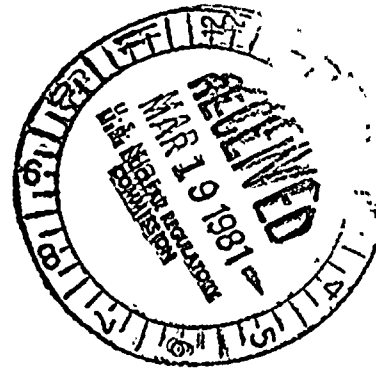
JOHN E. MAIER
VICE PRESIDENT

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March 19, 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: Fire Protection Safe Shutdown Systems
R. E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Crutchfield:

In response to the NRC Fire Protection Safety Evaluation Report, dated February 14, 1979, a detailed study was performed by RG&E of the ability of plant operators to bring Ginna Station to a safe shutdown following a fire. This study, submitted on December 28, 1979, assumed that fire detection, automatic fire suppression and suppression by fire brigades were ineffective in extinguishing a fire. The study evaluated cable and equipment locations for equipment which could be used for plant shutdown. Both failure of equipment to function when called upon and inadvertent operation were postulated in order to address all possible scenarios.

The enclosed report has been prepared in response to the requirements of 10 CFR Part 50.48 and Appendix R to 10 CFR Part 50. This report builds upon the earlier report prepared by RG&E and extends the analyses by addressing the revised regulatory criteria and by including potential modifications.

We recognize, however, that equipment which may require modification or systems which may need to be supplemented for fire protection purposes may also require modification or supplementation in response to other regulatory concerns. For example, we have proposed certain changes in the Ginna Screen House to provide additional assurance of the operability of the service water pumps following a fire. However, changes may also be required to the service water system in the Screen House as a result of topic reviews in the Systematic Evaluation Program (SEP). Extensive cable rerouting is suggested in the enclosed

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DATE March 19, 1981

TO Mr. Dennis M. Crutchfield

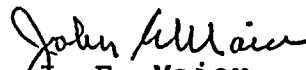
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report to provide additional assurance of the availability of safe shutdown equipment following a fire. Again, these plans could be impacted by SEP findings.

We believe that it would result in the best solutions from a safety standpoint, from a human factors standpoint, and from an economic standpoint, if an integrated approach were taken to the various regulatory requirements. We believe that such an integrated approach can be taken without significant slippage in schedules. It is our understanding that most SEP topics should be completed for Ginna by Fall 1981 with integrated assessment coming thereafter.

As a result of the limited time available since issuance of the revised fire protection regulations, and based on the status of SEP topic review, the enclosed report does not identify modifications other than those suggested, on a preliminary basis, for fire protection. We expect to refine our plans regarding fire protection in preparation for the additional submittal of May 19, 1981 that was identified by the NRC Staff in a letter dated February 20, 1981. While we will attempt to meet the May 19 submittal date, it may be necessary to seek an extension in order to attain the integration which we believe is necessary. We will advise you should such an extension be required.

Very truly yours,


J. E. Maier

Enclosure

