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

SUBJECT: Informs that Administrative Procedure A-52.4 was modified to incorporated definition of operability & require operator to review plant log as to operability of alternate equipment prior to removing safeguards equipment from svc.

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May 5, 1981

Mr. Dennis M. Crutchfield, Chief
Operating Reactors Branch No. 5
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Definition of Term "Operable"
R.E. Ginna Nuclear Power Plant, Unit No. 1
Docket No. 50-244

Dear Mr. Crutchfield:

By letter dated April 9, 1981, we were requested to provide information regarding how plant procedures had been modified and operators trained in order to assure plant protection under the various possible combinations of equipment failures.

Administrative Procedure A-52.4, "Control of Limiting Conditions for Operating Equipment" was modified to 1) incorporate the definition of operability, and 2) require operator to review plant log to verify alternate equipment is operable prior to removing safeguards equipment from service. The change to this procedure was approved April 29, 1981, and reads as follows:

> "A system, subsystem, train, component, or device shall be OPERABLE or have OPERABILITY when it is capable of performing its specified function(s). Implicit in this definition shall be the assumption that all necessary attendant instrumentation, controls, normal and emergency electrical power sources, cooling or seal water, lubrication or other auxiliary equipment that are required for the system, subsystem, train, component, or device to perform its function(s) are also capable of performing their related support function(s).
>
> When a system, subsystem, train, component, or device is determined to be inoperable solely because its emergency power source is inoperable, or solely because its normal power source is inoperable, it may be considered OPERABLE for the purpose of satisfying the requirements of its applicable limiting condition for operation, provided: 1) its corresponding normal or emergency power source is OPERABLE; and 2) all of its redundant system(s), subsystem(s), train(s), component(s), and device(s) are OPERABLE, or are likewise satisfying the above requirements.
>
> Unless both conditions 1 and 2 are satisfied, the reactor shall be placed in condition required per the appropriate Technical Specification requirement. This does not apply if the plant is in COLD SHUTDOWN or REFUELING MODE."

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Licensed operators were made aware of the change through circulation of the procedure and associated acknowledgement signature.

At the request of our NRC Licensing Project Manager, additional discussion of a recent plant event is provided. On April 7, 1981, the breaker from A Diesel Generator to Bus 18 was disabled in order to perform maintenance on the breaker. Based on past operating practice and technicial specification interpretation, the A Diesel Generator was not declared inoperable. Subsequently, at the request of the NRC Resident Inspector, the A Diesel Generator was declared inoperable. The maintenance procedures used to work on these breakers have been modified to require declaring the Diesel Generator inoperative when work is performed on the breaker. The additional change to A-52.4 will preclude recurrence of this type of Technical Specification interpretation problem.

Sincerely yours,

John E. Maier

John E. Maier

/jss