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SUBJECT: Forwards response to 810623 assessment of SEP Topic IX-3,
 "Cooling Water." Minor corrections should not change NRC
 conclusions.

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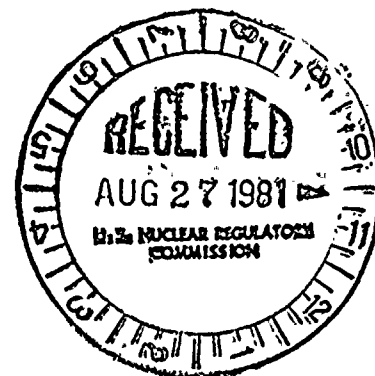
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JOHN E. MAIER
VICE PRESIDENT

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August 21, 1981



Director of Nuclear Reactor Regulation
Attention: Dennis M. Crutchfield, Chief
Operating Reactors Branch No. 5
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: SEP Topic IX-3, "Cooling Water"
R. E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Crutchfield:

This letter is in response to your June 23, 1981 assessment of this topic. The enclosure provides some minor corrections to the assessment; no changes to your conclusions should result from these comments.

Very truly yours,

John E. Maier
John E. Maier

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Enclosure: Comments to SEP Topic IX-3, Cooling Water
Transmitted by Letter from Crutchfield to Maier
on June 23, 1981

1. In the second paragraph on page 4, the timing of the commencement of the sump recirculation phase is provided as 31 to 54 minutes. For a double-ended LOCA, recirculation could begin at about 25 minutes. For a very small break, recirculation might not begin for several hours.
2. For completeness of documentation, a reference to the calculations used to arrive at the heat loads at the top of page 5, together with system assumptions (service water temperature and flow, e.g.), should be provided.
3. The reference for the information on plant procedures relative to loss of cooling water should be given. This was provided in Enclosure 2 of the January 23, 1981 letter from J. E. Maier, RG&E, to Dennis M. Crutchfield, NRC, SEP Topics III-1, VII-2, and VII-3.
4. The second paragraph on page 6 discusses moderate-energy pipe leaks. This topic has already been reviewed as part of SEP Topic III-5.B, "Pipe Break Outside Containment." This NRC assessment, transmitted by letter from Dennis M. Crutchfield, NRC, to Leon D. White, Jr., RG&E dated June 24, 1980, should be referenced in this assessment.
5. In the second paragraph on page 7, it is stated that "the licensee may be required to provide assurance that CCW makeup can be supplied following an earthquake." This appears to be inconsistent with the previous findings in the assessment, which note that safe plant shutdown can be accomplished, even without the availability of the CCW system (see second paragraph on page 6, for example).
6. Section V-II states that ". . . two SWS pumps are required . . ." This is not correct. Although two service water pumps are used for design diesel generator loading purposes (Table 8.2-1 of the FSAR), only one service water pump is required to provide essential post-accident cooling (Section 9.6.2 of the FSAR).
7. In the middle of page 8, and in the double asterisked footnote, the NRC's June 24, 1980 assessment of SEP Topic III-5.B should be referenced.

8. In the conclusion section regarding seismic capability of CCW makeup supply systems, our previous comment 5 also applies.
9. In Table 2, items 9 and 10 are designated as "critical" SW loads. These are non-safety-related functions, used during normal operation. They should be moved to Table 3.
10. In Section 3.0, References, dates should be given for items 6 and 8.

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