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SUBJECT: Forwards Rev 2 to EWR 4999, "Design Criteria Ginna Station Steam Generator Containment Penetration."

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March 13, 1990

U.S. Nuclear Regulatory Commission
Document Control Desk
Attn: Allen R. Johnson
Project Directorate I-3
Washington, D.C. 20555

Subject: Steam Generator Containment Penetration
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Johnson:

Spare mechanical containment penetration no. 2 is proposed to be modified by replacing its existing 10" Ø welded caps by a set of 10" Ø welding neck and blind flanges, on both in and outboard ends. This proposed modification would allow the routing of the Steam Generator Inspection/Maintenance (SGI/M) cabling into containment. The SGI/M cabling is necessary in order to perform the annual inspection and outage maintenance of the steam generators.

Prior to the 1990 outage, the SGI/M cabling was routed through the equipment hatch, whose closure required significant time and effort. The ability to achieve containment closure within two hours, (as required by item two (2) of the eight (8) expeditious action items recommended by USNRC Generic Letter 88-17) is enhanced by the use of this smaller penetration.

The design of this proposed modification specifies that the penetration shall be tested in accordance with the provisions of Appendix J of 10CFR50. The current allowable total leakage rate for all penetrations, including this penetration, will remain unchanged. In addition, a low administrative allowable leakage rate is applied to each individual penetration and will remain in place for the modified penetration.

The Ginna Technical Specifications identify those containment isolation valves (CIVs) whose operability is required above cold shutdown conditions to ensure containment integrity

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(Section 3.6.3). Technical Specification Table 3.6-1 provides a listing of these CIVs, their associated penetrations, and the maximum valve isolation times. This table identifies several penetrations containing no CIVs; however, for these cases the table only indicates "N/A" for isolation times and boundaries, and provides no technical information. Examples of these are the Personnel and Equipment Hatches, the fuel transfer tube, and the purge system penetrations. Therefore, since the proposed modification to Penetration no. 2 would not result in the addition of any CIV, adding this penetration to Table 3.6-1 would be of no technical benefit.

In addition, RG&E is planning to submit a license amendment in the near future requesting that Table 3.6-1 be removed from the Technical Specifications and the information placed in the Ginna UFSAR. As such, RG&E will commit to placing Penetration no. 2 in the UFSAR table. Also, RG&E proposes to submit a revision to Technical Specifications 4.4.1.5, section a (ii), and 4.4.2.4, section b at the same time. This revision would be an administrative change only and will result in this penetration being treated the same as the Personnel and Equipment Hatches, and the fuel transfer tube.

Very truly yours,

Robert C. Mecredy
Division Manager
Nuclear Production

Attachments

xc: Mr. Allen R. Johnson (Mail Stop 14D1)
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Washington, D.C. 20555

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Ginna Senior Resident Inspector