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SUBJECT: Discusses design basis of plant re A0V 745,CCWI return valve from excess letdown HX.

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July 9, 1990

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

Subject: Rochester Gas and Electric Corporation
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Johnson,

On June 8, 1990, RG&E notified the NRC under the criterion of 10CFR§50.72, of a condition outside the design basis of the plant associated with AOV 745, the component cooling water isolation return valve from the excess letdown heat exchanger. This notification was made as a result of information contained in Table 3.6-1 of the Ginna Technical Specifications and UFSAR Table 6.2-13, which indicated that AOV 745 should receive a Containment Isolation Signal (CIS). However, elementary wiring drawings did not show this valve as receiving such a signal.

Subsequent to this notification, RG&E determined that information contained on Technical Specification Table 3.6-1 for MOV 749A and MOV 749B (component cooling water isolation valves to the reactor coolant pumps) was also potentially misleading based on the fact that these valves do not receive a CIS but are shown with a maximum isolation time of 60 seconds. Consequently, RG&E has reviewed the background information available with respect to AOV 745, MOV 749A, and MOV 749B.

All three valves were reviewed by the NRC during implementation of the TMI Lessons Learned recommendations and the Systematic Evaluation Program. Penetration 124a was evaluated in these two programs assuming that it was nonessential, and that AOV 745 was a normally open valve which did not receive a CIS but was closed post-LOCA. Meanwhile, Penetrations 127 (MOV 749A) and 128 (MOV 749B) were considered essential penetrations with normally opened valves that also did not receive a CIS but remain open post-LOCA.

In a November 19, 1979 letter to the NRC discussing TMI Lessons Learned topics, RG&E stated that Penetration 124a was "nonessential" while Penetrations 127 and 128 were "essential". In previous correspondence from RG&E on this subject (dated June 22, 1979), a table was provided which listed all valves receiving a CIS; neither AOV 745, MOV 749A, nor MOV 749B were listed on this table.

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In Table 1 of the Final Evaluation Report for SEP Topic VI-4, dated April 12, 1982, it is indicated that the NRC assumed that AOV 745 was normally open, but closed post-LOCA. However, there is no information listed beneath the "Actuation" column for this valve which would indicate how the valve was expected to close. This table also shows MOV 749A and MOV 749B as normally open valves which remain open post-LOCA. These valves are shown as "remote manual" under "Actuation". In addition, drawings and the original Ginna FSAR as used by the NRC during the SEP did not show that there was a CIS to these three valves.

Therefore, the NRC had evaluated AOV 745, MOV 749A and MOV 749B in their current configurations during both the TMI Lessons Learned and Systematic Evaluation Programs, and found them to be acceptable. Since there was no conflicting supporting design basis information (e.g., UFSAR, elementary drawings) showing that MOV 749A and MOV 749B receive a CIS, these valves were not declared inoperable when it was determined that they did not receive a CIS, as had been done with AOV 745. Based on our review of this situation, RG&E interprets the 60 second maximum isolation time as listed in Technical Specification Table 3.6-1 to be valve closure time following a demand to close. This interpretation is consistent with Standard Review Plan 6.2.4, section II (n) and has been transmitted to the Ginna Station operation staff. Therefore, no changes are required with respect to MOV 749A and MOV 749B.

Penetration 124a is a closed system inside containment which is seismic and missile-protected. The current GDC 57 only requires a manual or remote-manual valve outside containment for this configuration. The safety function (i.e., containment isolation) of this penetration is met in the current configuration, even with AOV 745 normally open. RG&E has thus concluded that AOV 745 does not require a CIS to be considered operable since the containment isolation function associated with Penetration 124a is accomplished by the closed system inside containment and AOV 745 (without a CIS) outside containment. Therefore, the criteria of 10CFR$50.73 are not applicable to the discovery that AOV 745 does not receive a CIS.

However, because our response to item 2.1.4.3 in the above cited November 19, 1979 letter indicated that we would provide a CIS to valves in non-essential penetrations, even though such a signal goes beyond the requirements of GDC 57, RG&E commits to install such a signal to AOV 745 by the end of the 1992 refueling outage. In the meantime, in order to provide another level of assurance of containment isolation, RG&E is planning to modify the Emergency Procedures to direct the operators to remote-manually close this valve from the Control Room at an appropriate time following receipt of a CIS (e.g., following immediate actions of E-0). The addition of this procedure step will be accomplished by August 15, 1990.

RG&E has also discovered several additional typographical errors and needed clarifications associated with Technical Specification Table 3.6-1. However, these anomalies do not affect the safe operation of Ginna and will be corrected in the upcoming Amendment request to remove this table from the Technical Specifications and reference the UFSAR (anticipated submittal date October 1990).

Very truly yours,

Robert Mecredy
Division Manager
Nuclear Production

MDF\147

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