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 JOHNSON, A.R. Project Directorate I-3

SUBJECT: Suppls response to GL 90-06, stating that pressurizer PORVs would be environmentally qualified for potential post accident environ. No change to reactor operating mode should be made as result of having inoperable PORV.

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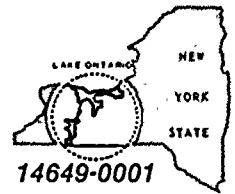
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November 3, 1992

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

Subject: Response to Generic Letter 90-06
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Johnson:

In RG&E's response to Generic Letter 90-06, we stated that the pressurizer PORV's would be environmentally qualified for any potential post-accident (e.g., steam generator tube rupture) environment. This commitment was made despite the NRC's assessment that classification and qualification of this equipment as safety-related was not justified (Section 2 of Enclosure A to Generic Letter 90-06). RG&E has performed a more detailed review of the benefits and costs associated with this modification, relative to the entire spectrum of proposed Ginna Station capital expenditures. We have concluded (consistent with the NRC's assessment) that it would not be cost-effective to upgrade this equipment.

The Technical Specifications we proposed in our September 15, 1992 are not affected by this change. As noted in Attachment B to that letter, second page, item 2, RG&E contends that no change of Reactor Operating Mode should be made as a result of having an inoperable PORV due to causes other than excessive seat leakage. This is because the PORV's are needed to perform specified functions during all Reactor Operating Modes, from "Operating" to "Cold Shutdown". No other sections of our September 15 submittal are affected by our decision not to modify the PORVs.

Very truly yours,

Robert C. Mecredy
Robert C. Mecredy

GJW/261

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Ginna Senior Resident Inspector