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MECREDY, R.C. Rochester Gas & Electric Corp.  
RECIP. NAME RECIPIENT AFFILIATION  
JOHNSON, A.R.

SUBJECT: Submits addl info re environ qualification of neutron flux instrumentation.

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ROBERT C. MECREDY  
Vice President  
Nuclear Operations

September 20, 1995

U.S. Nuclear Regulatory Commission  
Document Control Desk  
Attn: Allen R. Johnson  
Project Directorate I-1  
Washington, D.C. 20555

Subject: Supplemental Submittal Regarding Neutron Flux  
Instrumentation (TAC No. M90036)  
R.E. Ginna Nuclear Power Plant  
Docket No. 50-244

Ref. (a): Letter from Robert C. Mecredy, RG&E, to Allen R. Johnson,  
NRC, "Use of Neutron Flux Instrumentation During Post-  
Accident Severe Accident Conditions," February 3, 1995

Dear Mr. Johnson:

As a result of NRC staff review of information submitted in Reference (a), a conference call was held between Rochester Gas and Electric and NRC staff on June 30, 1995. During that call, the NRC staff discussed additional information needed to conclude that environmental qualification of neutron flux instrumentation is not necessary. Accordingly, we are providing the following information which we believe satisfies the remaining staff concern regarding this issue:

Concern: Ensure that, in the event of an accident resulting in a harsh containment environment (for which source range neutron flux is not environmentally qualified), boration, as required to mitigate the accident, is being delivered to the core.

Response: RG&E agrees that boric acid injection is required in such circumstances. Our plant design provides for the automatic initiation of the engineered safety features (including boric acid addition via the safety injection pumps) upon receipt of an adverse containment signal of 4 psig. A review of our Emergency Operating Procedures (EOP's) indicates that actions are presently specified to direct the operator to restore safety injection if initiation is not obtained. For postulated accidents where the RCS is not depressurized below the shutoff head of the safety injection pumps, the operator is directed to align boric acid injection using the charging pumps.

We believe that our current arrangement of EOPs and Critical Safety Function Status Trees, allowing for optimal recovery procedures to

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be exercised prior to reliance on Functional Restoration Procedures (FRs), combined with timely use of appropriate FRs as needed, provides the actions needed to address the NRC's concern.

Even though we believe that the current procedures acceptably address the NRC's concern, we are emphasizing this issue, including a caution to the operators to not rely on neutron flux during a harsh environment condition, in our latest operator regualification training cycle session, which began on August 8, 1995.

Very truly yours,

  
Robert C. Mecredy

GJW\388  
Attachment

xc: Mr. Allen R. Johnson (Mail Stop 14B2)  
Project Directorate I-1  
Washington, D.C. 20555

U.S. Nuclear Regulatory Commission  
Region I  
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Ginna Senior Resident Inspector