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SUBJECT: Submits remaining responses re 960209 LAR for LTOP, raised by
 CY Liang. Issues 1 & 6 resolved during 960313 conference call.

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ROBERT C. MECREDY
Vice President
Nuclear Operations

March 15, 1996

U.S. Nuclear Regulatory Commission
Document Control Desk
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Project Directorate I-3
Washington, D.C. 20555

Subject: Response to NRC Questions Related to February 9, 1996 LAR
for LTOP.
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

In response to the subject submittal, six questions were raised by C Y Liang, the NRC reviewer. These were discussed in a conference call on March 13, 1996, and issues 1 and 6 were resolved at that time. The remaining responses are provided in the attachment.


Very Truly Yours
Robert C. Mecredy
Vice President,
Nuclear Operations

GJW:lrc

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Attachment:

Issue (1): Page 5 of the Low Temperature Overpressure Analysis Summary Report (LTOASR) indicates that the heat addition events are analyzed at RCS temperatures of 85 F and 320 F. Discuss why 320 F is the maximum credible temperature at which a secondary to primary temperature difference of 50 F can be achieved. Are there any operating procedures which would prevent startup of a reactor coolant pump at an RCS temperature less than 320?

Response: Response not required per telecon 3/13/96.

Issue (2): Page 7 of the LTOASR indicates that the PORVs are set to lift when the pump suction pressure on the loop with the pressurizer exceeded 430 psig. Based on this criterion, what is the calculated setpoint for the PORVs including instrument uncertainties?

Response: Instrument uncertainty for the pressure loops is 18.5 psig. Therefore the maximum allowable setpoint is $430 - 18.5 = 411.5$ psig. The setpoints are procedurally set to 410 psig.

Issue (3): Page 7 of the LTOASR states that instrument error is not normally considered for Appendix G protection but is included in the analysis for RHR overpressure concerns. Provide clarification to confirm that the instrument errors are considered in the determination of the LTOP setpoint, consistent with the LTOP methodology document for Ginna.

Response: The report was written based on the current Ginna analysis. Our new methodology requires instrument uncertainty to be included and the analysis does include instrument uncertainty (see response to item 2).

Issue (4): Page 13 of the LTOASR states that the analysis was terminated after 10 minutes when the operator was assumed to secure charging flow. Briefly describe the operating procedures used and instrumentation relied on for the operator to terminate the event. Justify that 10 minute operator action is a reasonable assumption in the mass addition analysis.

Response: Several indications are available to the operator including:

1. Continuous recording of RCS pressure on the control board.

2. MCB Annunciators for RCS Overpressure Protection Actuation.
3. MCB Annunciators for high RHR pressure.
4. Charging pump status lights.

It should be noted that there are no signals to automatically start a charging pump. Therefore the mass addition event could only be initiated as a direct result of an operator action (i.e. starting an additional pump). Thus, the operator would be in the position to quickly stop the pump.

Annunciator response procedures to the LTOPS actuation alarm require the operator to reduce RCS pressure. This can only be accomplished by stopping charging pumps or increasing letdown flow, both of which are accomplished from the control room. The 10 minute operator action time is considered very conservative for these actions.

Issue (5): Provide discussion on the LTOP enable temperature which is not addressed in the LTOASR.

Response: The LTOPS system is manually enabled prior to RCS temperature decrease below 330°F. The basis is shown on PTLR Figure 1 and 2, which indicates the limiting RT_{ndt} at 1/4T is 210°F. The basis for the enable temperature, shown in Section 3.4 of WCAP - 14040, is at least $RT_{ndt} + 90^\circ\text{F}$ (i.e. 300°F). The chosen value of 330°F is conservative. This is unchanged by this analysis.

Issue (6): Provide discussion of the supporting analysis for the vent size of 1.1 sq. in. which is not addressed in the LTOASR.

Answer: Response not required per telecon 3/13/96.

