

# CATEGORY 1

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9610170166      DOC. DATE: 96/10/10      NOTARIZED: NO      DOCKET #  
 FACIL: 50-244 Robert Emmet Ginna Nuclear Plant, Unit 1, Rochester G 05000244  
 AUTH. NAME      AUTHOR AFFILIATION  
 MECREDY, R.C.      Rochester Gas & Electric Corp.  
 RECIP. NAME      RECIPIENT AFFILIATION  
 VISSING, G.      Project Directorate I-1 (PD1-1) (Post 941001)

SUBJECT: Requests approval of IST program cold shutdown justification  
 which replaces quarterly testing requirements for valves MOV  
 897 & MOV 898 w/testing to be performed during cold shutdown  
 conditions provided for in ASME OM Part 10 Section 4.2.

DISTRIBUTION CODE: A047D      COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 3  
 TITLE: OR Submittal: Inservice/Testing/Relief from ASME Code - GL-89-04

NOTES: License Exp date in accordance with 10CFR2,2.109(9/19/72).      05000244

	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
	PD1-1 LA	1 1	PD1-1 PD	1 1
	VISSING, G.	1 1		
INTERNAL:	AEOD/SPD/RAB	1 1	<u>FILE CENTER 01</u>	1 1
	NRR/DE/EMEB	1 1	NUDOCS-ABSTRACT	1 1
	OGC/HDS3	1 0	RES/DET/EMMEB	1 1
	RES/DSIR/EIB	1 1		
EXTERNAL:	LITCO ANDERSON	1 1	NOAC	1 1
	NRC PDR	1 1		

**NOTE TO ALL "RIDS" RECIPIENTS:**

PLEASE HELP US TO REDUCE WASTE. TO HAVE YOUR NAME OR ORGANIZATION REMOVED FROM DISTRIBUTION LISTS  
 OR REDUCE THE NUMBER OF COPIES RECEIVED BY YOU OR YOUR ORGANIZATION, CONTACT THE DOCUMENT CONTROL  
 DESK (DCD) ON EXTENSION 415-2083

TOTAL NUMBER OF COPIES REQUIRED: LTTR    13    ENCL    12

C  
A  
T  
E  
G  
O  
R  
Y  
  
1  
  
D  
O  
C  
U  
M  
E  
N  
T





ROCHESTER GAS AND ELECTRIC CORPORATION • 89 EAST AVENUE, ROCHESTER, N.Y. 14649-0001



AREA CODE 716 546-2700

ROBERT C. MECREDY  
Vice President  
Nuclear Operations

October 10, 1996

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

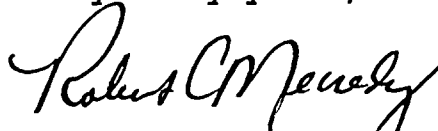
Subject: Ginna Station Inservice Testing Program Cold Shutdown  
Justification CS-37  
R.E. Ginna Nuclear Power Plant  
Docket No. 50-244

Dear Mr. Johnson:

The purpose of this letter is to request NRC approval of the subject Cold Shutdown Justification, as attached. This replaces quarterly testing requirements for valves MOV 897 and MOV 898 with testing to be performed during cold shutdown conditions as provided for in ASME OM Part 10 Section 4.2. This request is made in accordance with the provisions of 10 CFR 50.55a(a)(3)(ii) in that testing of these valves during normal plant operations renders all three pumps in the high head safety injection system inoperable due to the series arrangement of the valves in the common recirculation line. This condition requires entry into Technical Specification 3.0.3 which, in turn, requires that provisions be implemented to put the plant in Mode 3 status within six hours. Since the normal and accident position of these valves is open, and the quarterly testing moves these valves from their accident position, performance of these testing requirements results in hardship and unusual plant conditions with no compensating increase in safety. In fact, this testing results in the removal of an entire accident mitigation function due to closure of the common recirculation path.

Your action on this item by 10/31/96 would be greatly appreciated and would eliminate the necessity of performing the next quarterly test and having to enter LCO 3.0.3.

Very truly yours,

  
Robert C. Mecredy

9610170166 961010  
PDR ADCK 05000244  
G PDR

REJ\437

170039

AD47 1/1



xcc: Mr. Guy Vissing (Mail Stop 14C7)  
Project Directorate I-1  
Washington, D.C. 20555

U.S. Nuclear Regulatory Commission  
Region I  
475 Allendale Road  
King of Prussia, PA 19406

Ginna Senior Resident Inspector



## Cold Shutdown Justification

### CS-37 (Proposed)

Valves: 897, 898

System: Safety Injection      P&ID: 33013-1261

Category: B, Active      Class: 2

Function: These valves are in a series arrangement and serve as return isolation valves to the Refueling Water Storage tank (RWST) from the recirculation piping for the Safety Injection (SI) pumps. These normally-open valves must remain open to provide low flow recirculation for the SI pumps during accident mitigation. The close function is used during post-accident recirculation to isolate the recirculation path from the RWST.

Justification: During power operation, these valves are maintained open to provide minimum flow protection for the high head safety injection pumps. Closing either of the subject valves renders the high head safety injection system inoperable. This condition requires entry into Technical Specification Section 3.0.3 which requires actions to be taken to place the plant in Mode 3 within 6 hours. In addition, each entry to this section requires generation of an LER.

