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FACIL:50-244 Robert Emmet Ginna Nuclear Plant, Unit 1, Rochester G 05000244
AUTH.NAME AUTHOR AFFILIATION
MAIER,J.E. Rochester Gas & Electric Corp.
RECIP.NAME RECIPIENT AFFILIATION
DENTON,H.R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Requests extension to June 1981 to complete installation of approved fire protection features.Implementation dates for mods & status of incomplete items provided.

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

JOHN E. MAIER
VICE PRESIDENT

TELEPHONE
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January 26, 1981

Mr. Harold R. Denton
Director, Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Re: Rochester Gas and Electric Corporation - Robert E. Ginna Nuclear Power Plant - Compliance with 10 CFR § 50.48

Dear Mr. Denton:

Pursuant to 10 CFR section 50.48(d), Rochester Gas and Electric Corporation ("RG&E" or "the Company") requests an extension of time to complete the installation of certain of the fire protection features accepted by the Nuclear Regulatory Commission Staff in its Fire Protection Safety Evaluation Report ("SER") for Robert E. Ginna Nuclear Power Plant and Supplement No. 1 thereto ("SER Supplement").

Section 50.48 of 10 CFR was adopted by the Nuclear Regulatory Commission on November 18, 1980, to become effective on February 17, 1981. 45 Fed. Reg. 76602 (Nov. 19, 1980), corrected, 45 Fed. Reg. 79409 (Dec. 1, 1980). Subsection (d) of that section requires completion of the fire protection features accepted by the NRC Staff in the SER and SER Supplement by the completion date specified in the plant's license or technical specifications or the date determined by paragraphs (d)(1) through (d)(4) of section 50.48, whichever is sooner. If the earliest of these dates occurs before February 17, 1981

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(the effective date of section 50.48), we understand that, for purposes of section 50.48, the completion date for the affected fire protection features would be February 17, 1981.

HISTORY OF RG&E/NRC CONSIDERATION OF GINNA FIRE PROTECTION MODIFICATIONS

It is important to place this request for an extension of time in proper chronological perspective. The development and implementation of the NRC's fire protection guidance has been a complex, technically demanding process, the integrated requirements of which have evolved over the past four years. The following recitation of the efforts of RG&E and NRC Staff in developing and implementing the Ginna fire protection program illustrates this point:

		Approx. Elapsed Time Between Milestones
March 1975	- Browns Ferry fire occurred	
February 1976	- Special Review Group released recommendations (NUREG-0050)	11 mos.
May 1976	- NRR issued Branch Technical Position (BTP) 9.5-1	3 mos.
June 1976	- BTP 9.5-1 guidance published for public comment as Reg. Guide 1.120	1 mo.
August 1976	- Appendix A to BTP 9.5-1 published for use by plants docketed prior to 7/1/76	2 mos.
February 1977	- RG&E submitted document in response to BTP 9.5-1	6 mos.

June 1978	- NRC Staff visited Ginna to evaluate fire protection program (a visit which had been rescheduled 10 times by Staff) 1/	16 mos.
February 1979	- NRR issued Ginna Fire Protection SER which approved modification schedule providing for 6/81 completion of last items	8 mos.
April 1980	- NRC Staff responded to RG&E submittals made pursuant to SER during 4/79-12/79	15 mos.
May 1980	- NRC provided RG&E with a copy of proposed Appendix R; 10 CFR § 50.48 proposed by NRC	1 mo.
June 1980	- RG&E met with NRC Staff to discuss Staff response to RG&E submittals and Appendix R	1 mo.
November 1980	- NRC adopted 10 CFR § 50.48 and Appendix R, effective February 17, 1981	5 mos.
December 1980	- NRC issued SER Supplement No. 1 accepting RG&E proposals with respect to previously incomplete SER items	1 mo.

1/ These ten changes in the site visit date occurred over a one year period. We understand that plants in the Systematic Evaluation Program, like Ginna, purposely were visited toward the end of the Staff site visit program so that fire protection modifications could be put in the context of SEP modifications.

The foregoing events, of course, represent only the major milestones in the development and implementation of the Ginna fire protection program. Numerous other written communications and oral discussions between the Company and the Staff transpired following RG&E's initial submittal in February 1977.

The SER issued in February 1979 provided completion dates for each fire protection item which RG&E was required to implement. The implementation schedules, set out in SER Tables 3.1 and 3.2, specified that the last items were to be completed by June 1981. Until recently, RG&E has been proceeding in accord with Tables 3.1 and 3.2. Because of the heavy Three Mile Island-related work load with which licensees have been faced, there has been some slippage in milestone completion dates for several individual items addressed in the tables,[2/] but the Company had every expectation of completing the total modification program by June 1981, the end date specified in SER Table 3.1. To that end, the Company had planned its own internal engineering schedule and had negotiated and contracted with architect-engineering firms for outside engineering work on the basis of the SER completion dates.

When it became apparent in May 1980 that the NRC was giving consideration to a requirement that all items be completed by November 1, 1980, notwithstanding a specific plant's SER schedule, the Company compressed its engineering and construction schedules to the maximum extent possible. As a result, much of the outstanding work has been or will be completed by February 17, 1981. The completion status of the individual items is shown on Attachment 1. RG&E believes that it has exhausted every

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2/ The NRC Staff was notified by letter of slippages; none was ever disapproved or questioned.

feasible effort in bringing the fire protection program to the current degree of completion, including overtime work which has been authorized for both design and construction.

ITEMS FOR WHICH AN EXTENSION IS NECESSARY

The SER listed fifty-eight items related to plant design and operation which are part of the Ginna fire protection evaluation and modification program. Two items (Items 3.2.1 and 3.2.2) relate to a safe shutdown system and are not impacted by the February 17, 1981 deadline. Five items (Items 3.1.11, 3.1.21, 3.1.48, 3.2.6, and 3.2.8) involve modifications which only recently have been, or are about to be, approved by the NRC Staff. See SER Supplement at 2-3, 4, 5 (as to Items 3.1.11, 3.1.21, 3.1.48, and 3.2.6; we expect an SER Supplement for Item 3.2.8 to be issued in the near future). We read section 50.48 as allowing a licensee a specified period of time following NRC approval to implement a modification, thus providing the Company with a deadline later than February 17, 1981 for the items approved by the SER Supplement and the work associated with Item 3.2.8.

Of the remaining fifty-one items, the Company has identified the following fourteen items as being ones which may not be completed in all respects by the date required by section 50.48: Item 3.1.1; Item 3.1.2; Item 3.1.3; Item 3.1.5; Item 3.1.7; Item 3.1.8; Item 3.1.9; Item 3.1.12; Item 3.1.19; Item 3.1.37; Item 3.1.39; Item 3.1.42; Item 3.1.49; and Item 3.2.3.

The Company currently is pursuing an engineering/construction schedule which contemplates completion of a high percentage of work relating to these items by February 17, 1981, followed by expeditious completion of the remaining work thereafter. However, for a number of reasons, RG&E does not believe it reasonable to predict further schedule improvements. First, the current schedules are ones which already have been compressed to the maximum extent possible. Second, the Company is encountering delays in procuring some materials required for completion of several items. Third, Company resources must also be allocated in this time frame to preparation for a major shutdown scheduled to begin in April 1981 and

to certain other engineering and construction tasks mandated by the NRC. Consequently, the Company requests that you approve an extension to June 1981 for completion of the fourteen items required to be completed by February 17, 1981. An extension to this date will not exceed the dates determined by 10 CFR sections 50.48(c)(1) through (c)(4).

It is conceivable, of course, that many, if not all, of the outstanding items will be completed in advance of June 1981. However, the Company believes it preferable at this time to seek an extension to a date which it has every confidence of meeting. Work, nonetheless, would continue on the schedules currently being pursued.

THE STATUS OF THE INCOMPLETE ITEMS

As noted before, Attachment 1 lists the percentage completion of each fire protection item which is not yet complete. A discussion of the work remaining to be done for each item follows. With respect to seven of these items, particular note should be taken of the fact that the completion date authorized by the SER since February 1979 is June 1981, the very date to which the Company now must seek an extension as a result of the promulgation of section 50.48. The items which had SER completion dates of June 1981 are Water Suppression Systems and Equipment (3.1.2); Gas Suppression Systems and Equipment (3.1.3); Water Spray Shields (3.1.7); Fire Dampers (3.1.9); Diesel Room Water Suppression System (3.1.19); Fire Dampers (3.1.37); and Reactor Coolant Pump Lube Oil Collection System (3.1.39).

Suppression Systems (Items 3.1.2, 3.1.7, 3.1.19, 3.1.21, 3.2.3)

RG&E expects that all major piping and most of the deluge system associated with the suppression systems will be complete by February 17, 1981. Work to be completed includes installation of the deluge systems in the intermediate building and the relay room; installation of spray shields and the control room water curtain; and the testing of all systems, including the relay room halon

system test. The SER completion date for all these items, with the exception of the control room water curtain, is June 1981. As for the water curtain, the Company's design was not accepted by the NRC Staff until the issuance of the SER Supplement in December 1980. SER Supplement at 3-4. Likewise, it was not until the issuance of the SER Supplement that several of the features of the water suppression system were approved. SER Supplement at 2.

Detection Systems (Items 3.1.1, 3.1.3, 3.1.12, 3.1.42)

By February 17, 1981, approximately 85 percent of the detection system work will be completed. The remaining work with respect to these items involves installation of the main control panels and terminations, making the interface with existing systems, and final testing. Delays have been encountered because of labor unavailability and difficulty in procuring smoke detectors.

Fire Doors (Item 3.1.5)

Ninety percent of the work on this item will be completed by February 17, 1981. Installation of the fire doors will be completed in conjunction with installation of new pressure doors to serve both pressure and security functions. Pressure door installation was delayed by the NRC approval process.

Fire Barriers (Item 3.1.8)

Ninety-five percent of the work on this item has been completed, with construction of the barrier between the cable tunnel and the intermediate building the remaining task. Approval of RG&E's proposal for this barrier was not provided by the NRC Staff until December 1980 when the SER Supplement was issued.

Battery Room Ventilation (Item 3.1.11)

Completion of this item required NRC Staff approval of RG&E's use of flow switches in the battery room exhaust ducts. That approval was given in December

1980. SER Supplement at 2. The construction work associated with this item will be approximately 15 percent complete by February 17, 1981.

Fire Dampers (Items 3.1.9, 3.1.37)

Approximately 15 percent of the construction effort associated with these items will be completed by February 17, 1981. The SER completion date for these items is June 1981.

Reactor Coolant Pump Lube Oil Collection System (Item 3.1.39)

One RCP lube oil collection system was installed during the November 1980 shutdown, and the system for the second pump will be installed during the Spring 1981 shutdown. The SER completion date for this item is June 1981.

Hydrogen Piping (Item 3.1.48)

Fifty percent of the installation associated with this item will be completed by February 17, 1981. NRC Staff approval of the hydrogen piping routed through the auxiliary building was only recently given. SER Supplement at 4. RG&E has also encountered delays in instrument delivery.

Kitchen Area (Item 3.1.49)

The construction associated with this item will be undertaken during the Spring 1981 shutdown to avoid disruption of plant operation. Earlier construction schedules were deferred due to a number of other NRC-mandated modifications in the control room (e.g., electrical anchor bolts, fire detection and suppression). Fire hazards in the kitchen area will be removed by February 17, 1981, and not returned until the fire barrier is constructed.

Backflow Penetration Evaluation (Item 3.2.6)

RG&E's proposal for modifications to alleviate the NRC Staff concern about the spreading of combustible liquids through the drain system was only approved in

December 1980. SER Supplement at 6. The necessary modifications to containment and the auxiliary building will be completed during the Spring 1981 shutdown.

Exposed Structural Steel Study (Item 3.2.8)

Modifications resulting from the NRC Staff's evaluation of RG&E's Exposed Structural Steel Study will be in progress on February 17, 1981, but may not be completed until June 1981. We understand that an SER Supplement regarding this item is under preparation by the NRC Staff.

GRANTING THE EXTENSION WILL NOT ADVERSELY AFFECT PUBLIC HEALTH AND SAFETY

With respect to Ginna, the NRC Staff concluded in February 1979 that

> the operation of the facility, pending resolution of the incomplete items and the implementation of all facility modifications, does not present an undue risk to the health and safety of the public based on our concurrence with the Browns Ferry Special Review Group's conclusions identified above, as well as the significant improvements in fire protection already made at the facility since the Browns Ferry fire. These include establishment of administrative controls over combustible materials and use of ignition sources, training and staffing of a fire brigade, and issuance of technical specifications to provide limiting conditions for operation and surveillance requirements on fire protection systems.

SER at 8-2 (emphasis added). In its subsequent Supplement to the SER, the NRC Staff concluded that "all of the incomplete items in the [SER], except the design of the dedicated safe shutdown capability, have been acceptably resolved subject to implementation of the approved modifications." SER Supplement at 6. As of February 17, 1981, at least 37 of the 56 required modifications to the plant or to Company procedures will have been accomplished.

[illegible]

Given that the operation of the plant did not present an undue risk to the health and safety of the public at the level of fire protection achieved by February 1979, and given that the level of protection has been significantly enhanced since then, the approval of an eighteen week extension for completion of the fire protection program at Ginna certainly poses no undue risk to health and safety. Moreover, for approximately ten of those eighteen weeks, the plant will be shut down for refueling and a turbine generator overhaul, further minimizing whatever minimal risk might be said to exist.

Granting this request is also in the public interest. Should the extension be denied and plant operation be prohibited until the remaining fire protection items are completed, the cost to the Company's customers, as a result of higher fuel charges and replacement power costs, would be approximately $24 million (for the period February 18 - April 3 and June 3 - June 30, 1981).

In conclusion, the Company believes that the foregoing materials and attachments establish that good cause exists for extending the completion dates as requested herein and that the public health and safety would not be adversely affected by the extension. We look forward to your favorable response.

Very truly yours,

John E. Maier

John E. Maier

ATTACHMENT 1

TABLE 3.1

IMPLEMENTATION DATE FOR MODIFICATION

ITEM		STATUS 2/17/81	COMPLETION DATE
3.1.1	Fire Detection System	85% comp.	6/81
3.1.2	Water Suppression Systems and Equipment	75% comp.	6/81
3.1.3	Gas Suppression Systems and Equipment	85% comp.	6/81
3.1.4	Curbs	Complete	
3.1.5	Fire Doors	90% comp.	6/81
3.1.6	Computer Room Ceiling	Complete	
3.1.7	Water Spray Shields	15% comp.	6/81
3.1.8	Fire Barriers	95% comp.	6/81
3.1.9	Fire Dampers	30% comp.	6/81
3.1.10	Halon Storage	Complete	
3.1.11	Battery Room Ventilation	30%	6/81
3.1.12	Fire Alarms	85% comp.	6/81
3.1.13	Relocation of Gas Meter	Complete	
3.1.14	Diesel Generator Room Manhole Covers	Complete	
3.1.15	Flame Retardant Cable Coating	Complete	
3.1.16	Door Closure Adjustment	Complete	
3.1.17	Turbine Oil Reservoir Area	Complete	
3.1.18	Physical Examination	Complete	
3.1.19	Diesel Room Water Suppression System	80% comp.	6/81
3.1.20	Service Water Piping in Diesel Room	Complete	
3.1.21	Control Room Separation	30% comp.	6/81
3.1.22	Exterior Hydrants	Complete	
3.1.23	Emergency Lights	Complete	
3.1.24	Piping and Duct Penetrations	Complete	
3.1.25	Construction Joints	Complete	
3.1.26	Exterior Hose Houses	Complete	
3.1.27	Special Purpose Fire Fighting Equipment	Complete	
3.1.28	Fire Fighting Equipment Storage	Complete	

3.1.29	Diesel Fire Pump Testing & Surveillance	Complete	
3.1.30	Fire Door Supervision	Complete	
3.1.31	Brigade Training	Complete	
3.1.32	Control of Combustibles	Complete	
3.1.33	Control of Ignition Sources	Complete	
3.1.34	Prefire Strategies	Complete	
3.1.35	Off-Duty Brigade Recall	Complete	
3.1.36	Hose Stretch Tests	Complete	
3.1.37	Fire Dampers	30% comp.	6/81
3.1.38	Fire Barriers	Complete	
3.1.39	Reactor Coolant Pump Lube Oil Collection Systems	70% comp.	6/81
3.1.40	Fire Water Piping System	Complete	
3.1.41	Manual Hose Stations Inside Containment	Complete	
3.1.42	Signaling Circuits Supervision	85% comp.	6/81
3.1.43	Detector Testing	Complete	
3.1.44	Exterior Hydrant Freeze Protection	Complete	
3.1.45	Working Permit Involving Ignition Source	Complete	
3.1.46	Auxiliary Boiler	Complete	
3.1.47	Transient Combustibles	Complete	
3.1.48	Hydrogen Piping	65% comp.	6/81
3.1.49	Kitchen Area	15% comp.	6/81 1/

1/ A 1-hour rated fire barrier will be installed during the next refueling outage. Fire hazards in the kitchen will be removed prior to February 17, 1981 and remain out of the kitchen until the 1-hour rated fire barrier is installed.

TABLE 3.2
COMPLETION DATE FOR INCOMPLETE ITEMS

ITEMS		STATUS 2/17/81	COMPLETION DATE
3.2.1	Shutdown Analysis	Complete1/ (Study)	
3.2.2	Cable Separation	Complete2/ (Study)	
3.2.3	Relay Room Halon System Test	0% comp.	Upon completion of wall
3.2.4	Electrical Cable Insulation	Complete	
3.2.5	Electrical Cable Penetration	Complete	
3.2.6	Backflow Protection Evaluation	Complete3/ (Study)	
3.2.7	Fire Pump Performance	Complete	
3.2.8	Exposed Structural Steel	Complete4/ (Study)	
3.2.9	Fire Brigade Size	Complete	

1/ SER Supplement No. 1 states that evaluation of the safe shutdown will be reported in a subsequent safety evaluation.

2/ SER Supplement No. 1 states that item 3.2.2 shall be included under item 3.2.1.

3/ Modifications resulting from the Backflow Protection Evaluation will be installed during the next refueling outage. Scheduled completion date is 6/81.

4/ Modifications resulting from the Exposed Structural Steel Study are scheduled to be complete in 6/81.

(10-80)

U.S. NUCLEAR REGULATORY COMMISSION

REACTOR FACILITY FEE DETERMINATION

1 FEE FORM TYPE (Check one):
- [ ] PRELIMINARY
- [x] FINAL
- [ ] AMENDED

INSTRUCTIONS. Fill-in items 1 through 14, as applicable, and send the original copy to the License Fee Management Branch.

2 DOCKET NUMBER(S): 50-244

3. ACCESSION NUMBER: 8102020369

4 LICENSEE: Rochester Gas "fee due"

5 PLANT NAME AND UNIT(S): Ginna

6 DATE OF APPLICATION: 1/26/80

7 FEE REMITTED: YES [ ] NO [x]

8. LICENSEE FEE DETERMINATION

CLASS I	CLASS II	CLASS III	CLASS IV	CLASS V	CLASS VI	EXEMPT	NONE
							X

9 SUBJECT: Request for extension to requirements of 10 CFR 50.48 new "fire protect."

10. TAC NUMBER ASSIGNED (If available):

11 APPROVAL: [x] LETTER [ ] ORDER

AMENDMENT NUMBER(S):

DATE OF ISSUANCE: 2/13/81

12. NRC FEE DETERMINATION: [ ] The above application has been reviewed in accordance with Section 170.22 of Part 170 and is properly categorized.

[x] The above application has been reviewed in accordance with Section 170.22 of Part 170 and is incorrectly classified.

Fee should be class(es): III

JUSTIFICATION FOR CLASSIFICATION OR RECLASSIFICATION

This request involves a review of a single safety issue deemed not to involve a significant hazards consideration.

[ ] This application is a Class _____ type of action and is exempt from fees because it is:

- [ ] Filed by a nonprofit educational institution.
- [ ] Filed by a Government agency and is not for a power reactor.
- [ ] For a Class I, II, or III amendment which results from an NRC request dated _____ for the application and the amendment is to simplify or clarify License or Technical Specifications; has only minor safety significance; and is being issued for the convenience of NRC (*must meet all of the criteria*).
- [ ] Other (*State reason therefor*)

JS 2/5/81

13 SIGNATURE (*Branch Chief*): R Snaider-Porter Dennis M. Crutchfield — DATE: 2/5/81

14 FINAL CERTIFICATION The preliminary fee determination has been reassessed and is hereby affirmed.
SIGNATURE (*Project Manager or Branch Chief*) — DATE:

FOR LICENSE FEE MANAGEMENT BRANCH USE ONLY (*All others do not write below this line*)

The above exemption request has been reviewed and is hereby accepted as being exempt
SIGNATURE (*Chief LFMB*) — DATE:

DISTRIBUTION BY LFMB

Records Services Branch	DL Branch Chief	LFMB Exemption File	LFMB Reactor File

To Rebo 2/6/81