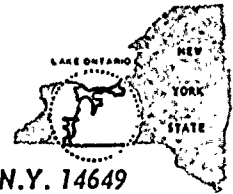




ROCHESTER GAS AND ELECTRIC CORPORATION • 89 EAST AVENUE, ROCHESTER, N.Y. 14649

JOHN E. MAIER
VICE PRESIDENT

TELEPHONE
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September 25, 1981

Director of Nuclear Reactor Regulation
Attention: Mr. Dennis M. Crutchfield, Chief
Operating Reactors Branch #5
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: SEP Topics VI-7.A.3 and VI-10.A
R. E. Ginna Nuclear Power Plant
Docket No. 50-244



Dear Mr. Crutchfield:

This letter is in response to your letter of December 15, 1980, transmitting the final SEP assessments for these two topics to Rochester Gas and Electric. Four items requiring resolution during the Integrated Assessment for Ginna were identified in these assessments. The information in the enclosure should resolve these concerns prior to the Integrated Assessment.

Very truly yours,

John E. Maier
John E. Maier

Enclosure

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Enclosure: RG&E Responses to Concerns Identified
in the Evaluation and Conclusions of the SEP
Assessment for SEP Topics VI-7.A.3 and VI-10.A, 12/15/80

1. The instrumentation strings from sensors thru bistable devices are not response time tested. As a result, the testing required by IEEE Std. 279-1968 Section 4.10 is not satisfied because the response time design basis (IEEE 279-1968 Section 3 (i)) is not verified.

Response: RG&E does not at this time perform response time testing of instrumentation strings for the Engineered Safety Feature System. We disagree, however, that the lack of such testing violates the provisions of IEEE 279-1968. RG&E does perform testing to verify that the final actuated devices are properly operational within the times assumed in the plant design basis. Appropriate test procedures were sent to the NRC with RG&E's transmittal of September 10, 1980.

The Ginna design does not conform with the provisions of Regulatory Guide 1.118, "Periodic Testing of Electric Power and Protection Systems." This regulatory guide was published long after Ginna became operational; it was thus obviously not considered in the design of the plant. The latest version of Regulatory Guide 1.118 (Rev. 2 published June 1978), states that this regulatory guide ". . . is being and will continue to be used in the evaluation of submittals in connection with Construction Permit applications . . ." (emphasis added). The implementation of this regulatory guide does not provide specific provisions for backfitting; it is not directly applicable to Ginna. RG&E further does not believe that strict adherence to the guidance provided in Regulatory Guide 1.118 is necessary to meet IEEE-279-1968 requirements. RG&E performs periodic tests and calibration on all components of the protection system instrumentation strings, including sensors. Any significant degradation in component response will be identified and corrected by this activity. RG&E is also preparing to implement certain response time testing at the Ginna plant. Ginna Technical Specifications 4.4.6.2 and 4.8.10 require that the response time of each containment isolation function and each auxiliary feedwater initiation function be demonstrated to be within required limits at least once per 18 months. RG&E is presently developing a program to effect this requirement.

It is considered that the current methodology meets the requirements of this SEP topic. This issue does not need to be considered further within the Systematic Evaluation Program.

2. The test procedures required the removal of fuses and installation of jumpers to block equipment operation and/or to simulate contact closure. The procedures often do not specify the time at which these jury-rigged modifications are removed. This situation is a violation of IEEE Std. 279-1968 Sections 4.13 and 4.20.

Response: RG&E is unclear as to how this conclusion was drawn from a review of the Ginna test procedures. When the removal of fuses and installation of jumpers to block equipment operation and/or simulate contact closure is required as part of a test procedure, the alignment of this equipment to its original configuration is also specified in the procedure.

If the use of jumper control is needed, when it is not directly specified in an approved maintenance, calibration, test, or modification procedure, procedure A-1402, "Bypass of Safety Function or Jumper Control" is used. Installation and removal of any such jumpers is performed by two knowledgeable individuals, one being the job foreman. A copy of this procedure, Rev. 1, is attached.

RG&E thus considers the procedures for use of jumpers and fuses acceptable, and in conformance with IEEE 279-1968.

3. The test procedures require that certain equipment be removed from service by racking out breakers and by pull to stop switches as well as the use of jumpers and removal of fuses discussed above. These test methods violate Section 4.20 of IEEE Std. 279-1968 because they are not annunciated to the operator in a timely manner such as to provide him with an unambiguous indication of the status of equipment needed to protect the public health and safety.

Response: RG&E requires that any safety system which is temporarily rendered inoperable due to testing during normal plant operations be monitored by the Ginna "Test Tag Control Program" (Procedure A-1103). A copy of this procedure is included. In addition, any testing, maintenance, or other operation performed on a safety-related piece of equipment at Ginna must be approved by the shift supervisor. Information about the operability of safety-related equipment to control room personnel is thus further assured.

4. As noted in Topic VI-4 we have also discovered that the override of an automatic ESF actuation signal incapacitates the system level manual actuation features.

Response: This concern was addressed in letters from John E. Maier (RG&E) to Dennis M. Crutchfield (NRC) dated March 2, 1981 and September 18, 1981. Resolution of any additional items is being addressed under SEP Topic VI-4.

ROCHESTER GAS AND ELECTRIC CORPORATION

GINNA STATION

CONTROLLED COPY NUMBER 21

GINNA STATION
UNIT #1
COMPLETED

DATE :-

TIME :-

PROCEDURE NO. A-1402

REV. NO. 1

BYPASS OF SAFETY FUNCTION OR JUMPER CONTROL

TECHNICAL REVIEW

PORC 4/8/81

QC Review
QC REVIEW

Q. A. REVIEW
C.R. Anderson 6-11-81

6-10-81
DATE

APPROVED FOR USE

Plant Superintendent
PLANT SUPERINTENDENT

6-13-81
DATE

QA X NON-QA _____ CATAGORY 1.0

REVIEWED BY: _____

THIS PROCEDURE CONTAINS 3 PAGES

A-1402BYPASS OF SAFETY FUNCTION OR JUMPER CONTROL1.0 PURPOSE:

- 1.1 To control the use of jumper wires, lifted wire, pulled fuses, use of states blocks, spool pieces, blank flanges, or other means to bypass, defeat or permit a device to perform or not perform its intended function.
- 1.2 This procedure does not apply when the function is altered as part of an approved maintenance, calibration, test or modification procedure, nor does it apply to use of installed switches or buttons.

2.0 REFERENCES:

- 2.1 None

3.0 INSTRUCTIONS:

- 3.1 The multileaf request form should normally be initiated by the Job Foreman by signature on the request form.
 - 3.1.1 Two knowledgeable individuals, one being the job foreman, shall concur on the location and clearly describe. Terminal point locations, wire number, fuse number, or other description shall be used.
 - 3.1.2 The Job Foreman shall ensure the function and purpose are listed.
- 3.2 The Shift Supervisor or alternate shall review the request for safety significance and effects on plant operations to determine whether the request should be approved or disapproved.
- 3.3 If approved, the Shift Supervisor or alternate shall assign a sequential Request #, preceded by the year (i.e., 80-1).
- 3.4 Implementation shall be verified by two knowledgeable individuals.
 - 3.4.1 Identification tags shall be attached to the jumper wire, lifted wire, or other device, as appropriate, to clearly identify the device.

NOTE: If it is not feasible to physically attach the tag to the device, the tag should be fastened in the immediate area.

- 3.4.2 Removal shall be verified by two knowledgeable individuals.

- 3.5 The Official Record shall indicate when this is performed, and when it is removed.
- 3.6 The Shift Supervisor shall review the active binder before a unit startup to ensure plant requirements are met.
- 4.0 RECORDS:
- 4.1 The multileaf request form original shall remain in the Shift Supervisor's active binder until completed, and then submitted to Central Records.
- 4.2 The yellow copy shall go to the Job Foreman, and may be destroyed when completed.
- 4.3 Jumper control tag(s) may be destroyed when completed.

ROCHESTER GAS AND ELECTRIC
GINNA STATION

REFERENCE PROCEDURE A1402

BYPASS OF SAFETY FUNCTION AND JUMPER CONTROL

JOB FOREMAN: _____ DATE: _____ REQUEST #: _____

VERIFIED BY: _____

JUMPER WIRE ☐ LIFTED WIRE ☐ FUSES PULLED ☐ STATES BLOCK ☐ OTHER ☐

FUNCTION _____

PURPOSE _____

LOCATION: _____

SHIFT SUPERVISOR: _____ DATE: _____

INSTALLATION

DATE & TIME _____

ENTERED IN OFFICIAL LOG: _____

NUMBER OF TAGS ISSUED: _____

INSTALLED BY: _____

VERIFIED BY: _____

REMOVAL

DATE & TIME _____

ENTERED IN OFFICIAL LOG: _____

NUMBER OF TAG REMOVED: _____

REMOVED BY: _____

VERIFIED BY: _____

ROCHESTER GAS AND ELECTRIC CORPORATION

GINNA STATION

CONTROLLED COPY NUMBER 21

PROCEDURE NO. A-1103

REV. NO. 1

TEST TAG CONTROL PROGRAM

TECHNICAL REVIEW

PORC 3/4/81

JC Bodine
QC REVIEW

3-18-81
DATE

APPROVED FOR USE

Bruce A. Shaw
PLANT SUPERINTENDENT

3-20-81
DATE

QA X NON-QA CATAGORY 1.0

REVIEWED BY:

THIS PROCEDURE CONTAINS 5 PAGES

A-1103TEST TAG CONTROL PROGRAM1.0 PURPOSE:

- 1.1 This procedure describes the test control program for surveillance testing and for special tests on equipment, systems, and structures under the jurisdiction of the Shift Supervisor.
- 1.2 This procedure also provides a method for indicating the status of a Nuclear Safety System which is temporarily inoperable because of testing during normal plant operations.

2.0 REFERENCES:

- 2.1 Ginna Quality Assurance Manual, Section 14.
- 2.2 Regulatory Guide 1.47 "Bypassed and Inoperable Status Indication for Nuclear Power Plant Safety System".

3.0 INSTRUCTIONS:3.1 Description

- 3.1.1 A test control program utilizing test tags (See Figure 1) and a test control log (See Figure 2), shall be utilized to provide the status indication and control of systems and equipment involved in the various tests. Valves, switches and other devices included in the test control program shall include:
 - 3.1.1.1 Those major components positioned out of their normal position for the duration of the test.
 - 3.1.1.2 Those boundary valves which are desired to remain closed during the test.
 - 3.1.1.3 Throttling valves under the control of test personnel.
 - 3.1.1.4 Critical system valves to remain open during the test.
 - 3.1.1.5 Valves placed out-of-normal alignment during verification of interlock functions need not be tagged if returned to normal position in a minimal amount of time.

NOTE: This system is not to be confused or used in place of the regular "Hold" system which is for the protection of equipment and personnel.

3.1.2 The "SAFE GUARDS TRAIN MODE INACTIVE"

This section of the TEST CONTROL LOG SHEET shall be used to indicate any nuclear safety systems made inoperable for more than 1 hour as a result of the related equipment involved in a test.

3.2 Tag Control Procedure

- 3.2.1 Prior to the start of the test, the test coordinator (Qualified Test Personnel Level II or III) shall review the Test Procedure with the "STATION HOLDING AUTHORITY" for test tag requirements after receiving permission to perform the test.
- 3.2.2 All test tags shall be logged in the Test Control Log by the Test Coordinator with each entry to include the following information: EQUIPMENT; POSITION DURING TEST; TEST NUMBER; TEST COORDINATOR; PERFORMED BY; DATE AND DATE TEST PERFORMED; SAFEGUARDS TRAIN MODE INACTIVE (AS APPLICABLE) AND STATION HOLDING AUTHORITY.
- 3.2.3 The Test Coordinator shall assure the first 4 lines of each test tag is complete and indicate the date the tag is placed.
- 3.2.4 Test tags shall be hung at the control switch, valve or other devices.
 - 3.2.4.1 In the event of an error on a test tag or changes in plant conditions which require a correction in test tag initial information, the test co-ordinator will be notified. Upon his concurrence, test personnel shall line out the initial information, insert required new information and initial the correction.
- 3.2.5 At the conclusion of the test, and with the permission of the "STATION HOLDING AUTHORITY", test tags shall be removed and status recorded in the Test Control Log. For testing during normal operation, "Test Termination" for safety systems temporarily inoperable, shall be when switches, valves and other related devices are returned to their pretest position and the system is again made fully operable.

NOTE: For testing during refueling outages, and if at the conclusion of the test it is agreed to leave a system in its test alignment for subsequent maintenance or inspection, the "STATION HOLDING AUTHORITY" shall transfer control status of boundary valves from "TEST" to Shift Supervisor "HOLD" as appropriate.

3.3 Test Control Record Retention

- 3.3.1 The Test Control Log is an official record for all test control operations and shall be maintained in the Main Control Room.
- 3.3.1.1 Completed log sheets will be given to Central Records for filing.
- 3.3.2 Test tags may be disposed of after procedure steps requiring them have been completed and the "Restored To Service" section of the Test Control Log has been filled out.

3.4 Plant Emergency During Testing

- 3.4.1 If a plant emergency condition should develop during a test, and it is desirable to lift restraints on a safety system temporarily inoperable because of the test, the Shift Supervisor shall notify the Test Coordinator to terminate the test and order the valves, switches or devices restored to their normal position.

