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February 15, 1994

U.S. Nuclear Regulatory Commission
Regional Administrator, Region I
Mr. Thomas T. Martin
475 Allendale Road
King of Prussia, PA 19406

Subject: Request For Enforcement Discretion
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Martin,

In accordance with 10 CFR Part 2, Appendix C, and using the guidance contained in NRC Inspection Manual Part 9900, RG&E requests Enforcement Discretion with respect to Ginna Station Technical Specification Table 4.2-1, #9 (Containment Isolation Trip). The request, background information, and justification is attached. This request was initially discussed with the NRC during a conference call on February 14th at 1400 EST. RG&E received verbal approval of the enclosed Enforcement Discretion during a phone conversation between James Linville, NRC, Region I, and Richard Marchionda, Ginna Station Superintendent, at approximately 1520 EST on that same date. This letter provides all necessary information requested during these two phone conversations.

Very truly yours,

Robert C. Mecredy

xc: U.S. Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
Assistant Director for Region I Reactors
Mr. Jose A. Calvo
Washington, D.C. 20555

Ginna Station Senior Resident Inspector

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1. **DESCRIPTION OF TECHNICAL SPECIFICATION REQUIREMENT**

Ginna Station Technical Specification (TS) Table 4.1-2, #9 requires that the "Containment Isolation Trip" be tested for "functioning" each refueling shutdown. TS Table 3.5-2, #4.1 defines the Containment Isolation function with respect to both manual and Safety Injection (auto actuation). The automatic actuation function was successfully tested during the 1993 refueling outage. There are two manual containment isolation pushbuttons; either pushbutton will actuate both trains of containment isolation. However, only one manual pushbutton was verified operable during the ILRT conducted during the 1993 refueling outage. TS Table 3.5-2, #4.1.a requires two channels of manual containment isolation. Generic Letter 87-09 states that failure to meet a required surveillance test is a failure to meet the LCO. The LCO with one channel inoperable is to restore the channel to operable status within 48 hours or be at Hot Shutdown within an additional 6 hours and at Cold Shutdown within the following 30 hours.

2. **DESCRIPTION OF REQUEST**

In response to Notice of Violation #93-021-01, RG&E committed to perform a review of surveillance requirements contained in TS Section 4 to ensure that implementing procedures existed for each requirement and that these procedures, do in fact, implement the TS requirement. In the course of performing this review, it was determined that the two manual containment isolation pushbuttons are not periodically tested in accordance with TS requirements. RG&E has conservatively determined that the pushbuttons are required to be tested in accordance with TS Table 4.1-2, #9.

The design of the containment isolation function, including the pushbuttons is shown on the attached two figures. As can be seen from these figures, either pushbutton will actuate both containment isolation trains. Relay C1(0) (or C2(0) for the redundant train) as shown on the drawings is normally deenergized. Pressing either pushbutton will energize this relay closes contact C1 (or C2) which energizes relay C15X (or C25X).

Surveillance Testing has not been routinely performed of the manual containment isolation pushbuttons. However, in preparing for performance of the ILRT during the 1993 refueling outage, one of the two manual pushbuttons was utilized to initiate containment isolation (procedure RSSP-6.0, step 6.8). Therefore, one pushbutton and the entire remaining containment isolation function was verified to be operable at this time. Only the remaining pushbutton and associated wiring to the containment isolation function was not tested within the TS required frequency (shown as a cloud on the drawings). It should be noted that since the ILRT procedure does not specify which pushbutton to use, it can be conservatively postulated that one pushbutton has not been verified.

Ginna Station is currently operating at approximately 98% full power. In order to perform the test of the remaining pushbutton, RG&E has determined that slide links would need to be opened for both trains of containment isolation. In addition, slide links for Containment Ventilation Isolation (CVI) would also have to be opened since manual containment isolation will also generate a CVI signal. The consequence of error in performing this action negates any advantage in performing this type of testing. Initiating full manual containment isolation at power would create a significant transient as RCS letdown, steam generator blowdown, instrument air to containment (supplies the PORVs) and seal return would isolate. Consequently, RG&E has concluded that the necessary pushbutton test has the potential for challenging engineered safety features and safe power operation.

Enforcement Discretion is therefore requested to grant RG&E relief from compliance with the requirements of TS Table 4.1-2, #9. This Enforcement Discretion is requested to begin on February 16, 1994 at 1000 hours when the current LCO for TS Table 3.5-2, #4.1 will expire. The Enforcement Discretion is requested to end on March 6, 1994 at 2400 hours when Ginna Station expects to achieve Cold Shutdown. The test of both containment isolation manual pushbuttons will be performed during the 1994 refueling outage.

3. **BASIS FOR REQUEST**

An automatic Safety Injection (SI) signal generates a Containment Isolation (CI) signal. Manual CI is only used if the SI annunciator is not lit and plant conditions require Safety Injection and Containment Isolation (Procedure E-0, Step 4). These conditions are defined based upon the plant parameters which automatically initiate SI, or if operators determine that SI is required. The failure of the automatic SI and CI initiation requires a failure of two independent channels. Since a manual SI signal will not initiate a CI signal, there must be a failure of the two independent automatic SI channels and a failure of the tested CI channel before the untested pushbutton would need to be operated.

In addition, all automatic containment isolation valves are stroked tested from the main control board on either a quarterly or refueling basis as documented in the NRC approved Ginna Station IST Program. Therefore, there is sufficient verification that operators could manually close all affected containment isolation valves from the control room if required. Finally, based upon the simple mechanical design of the pushbutton, there is a reasonable degree of assurance that the pushbutton will operate when required.

4. COMPENSATORY ACTIONS

Procedure E-0, Step 12 (Immediate Action Step) requires verification of the CI and CVI annunciators and the valve status lights. The failure to achieve annunciation and status lights results in operators manually closing the containment isolation valves from the control room or dispatching an auxiliary operator to locally close the valve (EOP Attachment CI/CVI). Therefore, sufficient guidance currently exists with respect to responding to the postulated scenario. In addition, written guidance has been provided to operators in the Plan of the Day (POD) to ensure that the second containment isolation pushbutton is used if manual CI is required and the first pushbutton fails.

5. JUSTIFICATION FOR DURATION OF REQUEST

Ginna Station is currently scheduled to begin a refueling outage on March 4, 1994. Therefore, the duration of the enforcement discretion is a total of 17 days until RG&E enters Cold Shutdown in preparation for the 1994 refueling outage. The need to initiate shutdown to perform the test of the pushbutton prior to the scheduled outage could potentially result in a plant transient during the shutdown process or the subsequent startup. Since the test would also have to be performed at Cold Shutdown, a significant number of tests would also have to be performed prior to startup. A test during power operation could potentially generate a containment isolation signal which would place a significant transient upon the plant. Based on the safety review in 3. above, RG&E has concluded that it is acceptable for one pushbutton to remain untested for the period of 17 days.

6. SIGNIFICANT HAZARDS EVALUATION

RG&E has evaluated the Enforcement Discretion request and concluded that there is no potential detriment to the public health and safety and that a significant safety hazard is not involved. This basis for this conclusion is summarized below:

a. Delaying testing of the affected containment isolation pushbutton does not involve a significant increase in the probability or consequences of an accident previously evaluated. The containment isolation function is used to mitigate an accident only and is not considered with respect to initiating an accident. Also, the manual containment isolation function is not credited in the Ginna Station UFSAR Chapter 15 accident analysis and, therefore, will not adversely affect any consequence analyses.

b. Delaying testing of the affected containment isolation pushbutton does not create the possibility of a new or different kind of accident from any previously evaluated. Since the manual containment isolation function is not credited in the Ginna Station UFSAR Chapter 15 accident analysis, the failure to test the identified pushbutton does not create a new or different kind of accident. The pushbuttons are also only used in response to an accident and would not be used in any scenario which creates a new or different kind of accident.

c. Delaying testing of the affected containment isolation pushbutton does not involve a significant reduction in a margin of safety since the function is not credited in the Ginna Station UFSAR Chapter 15 accident analyses. In addition, sufficient operator guidance is provided in the event that manual containment isolation is required and does not operate.

7. **ENVIRONMENTAL IMPACT**

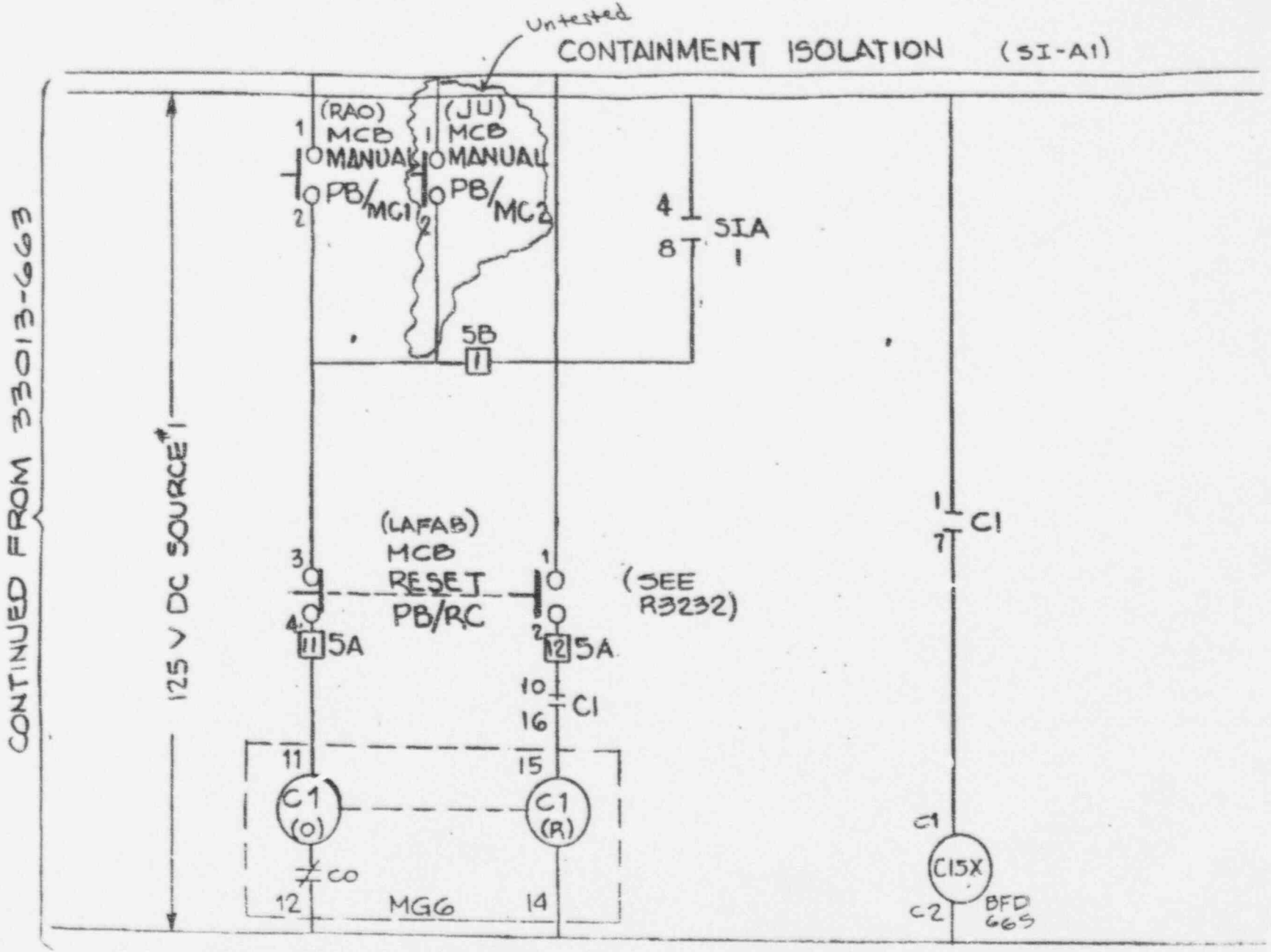
There are no environmental releases associated with the current plant condition nor the proposed relief from testing. The probability of requiring use of the untested manual containment isolation pushbutton is very small. In addition, sufficient guidance is currently available to the operators to respond to any postulated scenario which would require these pushbuttons. Therefore, there are no environmental consequences associated with this request.

8. **REVIEW BY PORC**

The Ginna Station PORC has reviewed and approved this request for Enforcement Discretion.

Richard Marchionda
Ginna Station PORC Chairman

2/15/94
Date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(JU) MCB MANUAL PB/MC2
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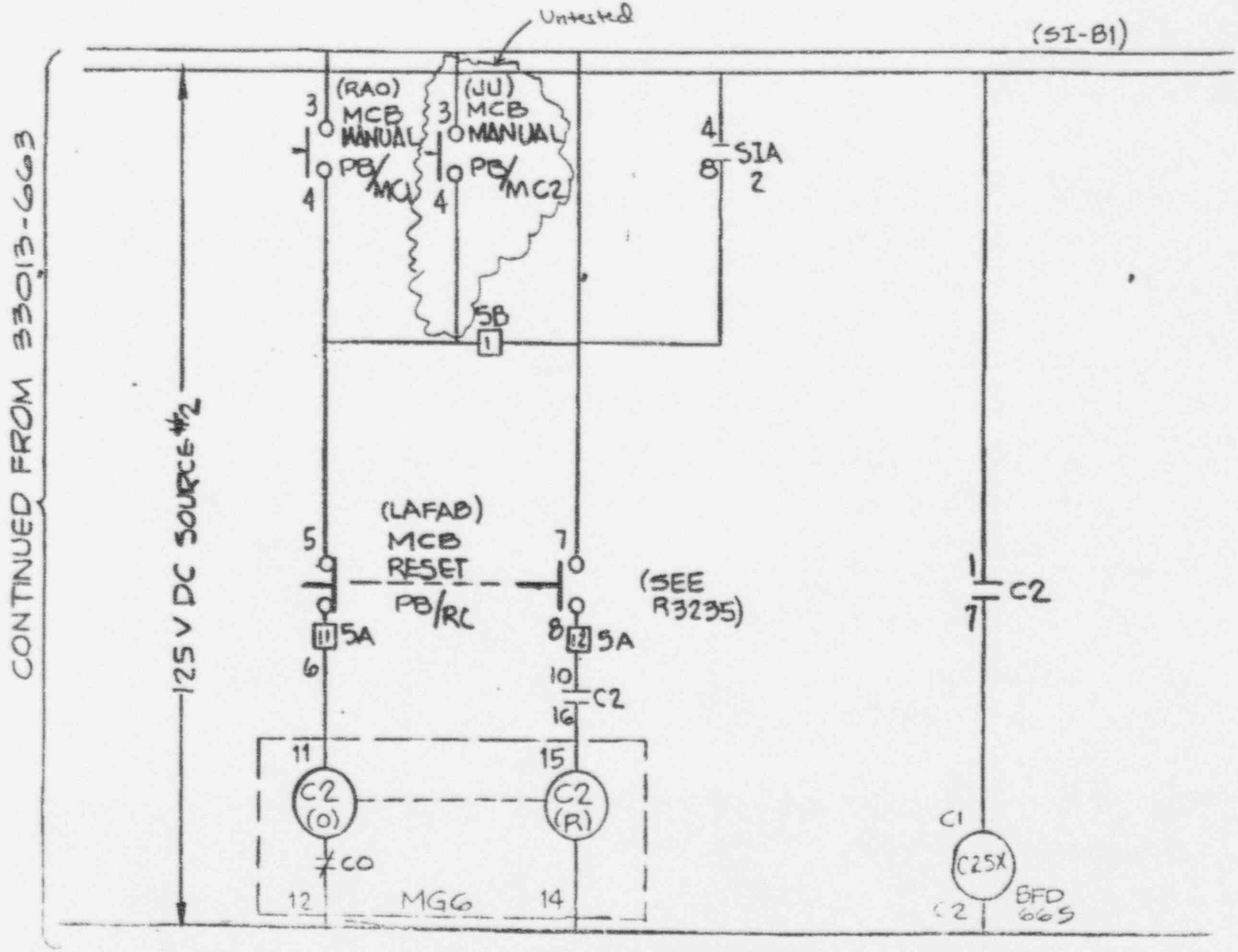
5B 1
(LAFAB) MCB RESET PB/RC
(SEE R3232)
3 4 11 5A
1 2 12 5A
10 16 C1
11 15
C1 (O)
C1 (R)
CO
12 MG6 14
1 7 C1
C1
C15X
C2 BFD 665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(RAO)
MCB
MANUAL
PB/MC1
(JU)
MCB
MANUAL
PB/MC2
SIA
2
5B
(LAFAB)
MCB
RESET
PB/RL
(SEE R3235)
5A
5A
C2
C2
C2
(O)
C2
(R)
≠CO
MGG
C1
C25X
BFD 665
C2