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SUBJECT: Responds to GL 89-08, "Erosion/Corrosion - Induced Pipe Wall Thinning."

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June 5, 1990

U.S. Nuclear Regulatory Commission
Document Control Desk
Attn: Allen R. Johnson
Project Directorate I-3
Washington, D.C. 20555

Subject: Response to Generic Letter 89-08
Erosion/Corrosion - Induced Pipe Wall Thinning
dated May 2, 1989
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Johnson:

In the July 21, 1989, RGE letter relative to NRC Generic Letter 89-08, we stated that the following items would be implemented prior to the completion of our 1990 Refueling Outage:

Review and revise our Erosion/Corrosion Monitoring Program (described in USNRC Bulletin 87-01 response transmittal from R. W. Kober to W. T. Russell, dated 9/8/87) as necessary. The revision would include the development of formalized procedures and/or administrative controls to assure that erosion/corrosion does not result in unacceptable degradation of the structural integrity of high energy carbon steel piping systems. The revised program would include use of the NUMARC program or another equally effective program.

RG&E has completed the following:

The existing RG&E Erosion/Corrosion Program has been reviewed and revised as follows:

RG&E has developed an Erosion/Corrosion Program for single and two phase systems consistent with the requirements of NUREG-1344 and NUMARC Erosion/Corrosion report, dated June 11, 1987. This program is documented in the Ginna Station Erosion/Corrosion Program Manual, April 1990.

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The RG&E Erosion/Corrosion Program Manual includes the following:


- 1) Frequency of Inspection Criteria
- 2) Acceptance Criteria
- 3) Inspection/Expansion Criteria
- 4) Repair/Replacement Criteria
- 5) Corrective Action

The following are included in the controlled RG&E Erosion/Corrosion program:

- 1) A list of systems for inclusion in the program has been identified. These systems include Main Steam, Condensate, Feedwater, Steam Generator Blowdown, Extraction Steam, Turbine Gland Steam, Gland Sealing Water and Moisture Separator Reheater system piping. CHEC/CHECMATE analyses have been performed for the systems.
- 2) The results of CHEC/CHECMATE analyses were combined with historical data, and a list of those components most susceptible to Erosion/Corrosion wear was developed. This list of components defines the scope of the E/C monitoring program for Ginna. From this list, a population of components were identified for examination during the 1990 Refueling Outage. Where the acceptance criteria were not met, corrective actions in the form of repairs and replacements were implemented. Other components will be scheduled for inspection during successive outages as a function of wear rates and conformance to acceptance criteria.

Although the program described above has been implemented, RG&E has not yet fully completed the administrative procedures. Currently, RG&E procedures are being developed to administratively control and implement the developed program. The procedures will define functional group responsibilities and interactions and administrative control of the program. The procedures for process control and administrative control will be completed by 10/30/90 and will be fully in effect to be utilized for the 1991 Outage inspection.

Very truly yours,


Robert C. Mecredy
Division Manager
Nuclear Production

xc: Mr. Allen R. Johnson (Mail Stop 14D1)
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Ginna Senior Resident Inspector

