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SUBJECT: Responds to 900709 request for addl info re containment integrity insp.

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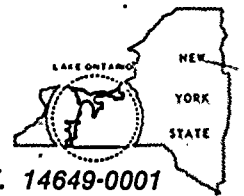
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July 11, 1990

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

Subject: Containment Integrity Inspection
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

Reference: July 9, 1990 NRC Request for Additional Information,
(TAC No. 67427)

Dear Mr. Johnson:

In response to the NRC's July 9, 1990 request for additional information, RG&E is providing the following responses in an expeditious manner.

RG&E does not believe that groundwater is entering the annular access area around containment from beneath containment, as suspected by NRC inspectors, but from behind the sheetpiling that form the retaining wall in the easternly quadrant of the intermediate building sub-basement. Because this area is classified as a confined space, and is contaminated, the effort necessary to confirm this information is difficult. Nonetheless, this major effort is underway. Preliminary results are expected by July 16, with detailed results expected by July 20.

RG&E also does not expect that any degradation of containment structural members is occurring at this time. We have met all necessary surveillance testing requirements needed to conform to the Ginna Technical Specifications, including many Integrated Leak Rate Tests (ILRT) and tendon surveillance tests (reviewed in SEP Topic III-7.A). Results from the 1989 ILRT were excellent and the just-completed tendon testing confirmed that all lift-off tests met acceptance criteria, and all inspected tendon wires were in "as-new" condition. RG&E will review the original structural design requirements of the containment and assess the impact of the recently determined groundwater level on the design. For structural details which are inaccessible due to location (high radiation area in the RHR room, or encased in rock or concrete) absolutely definitive conclusions may not be possible. However, our best engineering judgment will be used to provide reasonable


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assurance that the proper structural functions can be met. This approach is consistent with other types of surveillance tests (e.g. MOVATS testing in response to Generic Letter 89-10) where a duplication of post-accident functions cannot be achieved, but good judgment is used to extrapolate the ability to meet safety functions based on current available testing methodologies. Any reasonably available information, whether NRC or industry generated, will be used to help us perform such correlations.

Because of the unique nature of the Ginna containment design, as discussed in our July 9 telecon, RG&E proposes that the NRC technical reviewers and RG&E personnel discuss our findings and conclusions at a mutually acceptable time, such as the end of the week of July 23, at the RG&E offices.

Very truly yours,



Robert C. Mecredy
Division Manager
Nuclear Production

GJW/112
Attachment

xc: Mr. Allen R. Johnson (Mail Stop 14D1)
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Washington, D.C. 20555

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475 Allendale Road
King of Prussia, PA 19406

Ginna Senior Resident Inspector