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 FACIL: 50-244 Robert Emmet Ginna Nuclear Plant, Unit 1, Rochester G 05000244  
 AUTH. NAME AUTHOR AFFILIATION  
 WHITE, L.D. Rochester Gas & Electric Corp.  
 RECIP. NAME RECIPIENT AFFILIATION  
 NOVAK, T.M. Assistant Director for Operating Reactors

SUBJECT: Responds to NRC 800815 ltr re exposure of fuel assemblies &  
 control rods during transfer while in refueling mode. Revised.  
 Tech Specs will be revised to include min level requirement.

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LEON D. WHITE, JR.  
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September 26, 1980

Director of Nuclear Reactor Regulation  
ATTN: Mr. Thomas M. Novak,  
Assistant Director for Operating Reactors  
Division of Licensing  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Subject: August 15, 1980 NRC Letter to All Westinghouse Pressurized  
Water Reactor Licensees - Water Level above Reactor Vessel  
Flange while in Mode 6  
R. E. Ginna Nuclear Power Plant, Unit #1  
Docket No. 50-244

Dear Mr. Novak:

This is in response to your letter concerning the possibility of exposure of fuel assemblies and control rods during transfer while the plant is in Mode 6 (Refueling).

It has been normal practice at Ginna during refueling mode to maintain approximately 24.5 feet of water above the reactor vessel flange. Since the manipulator crane lifts the bottom of the fuel assembly no more than one foot above the reactor vessel flange during the transfer, this results in a water height of approximately 10 feet above the top of the fuel assembly and control rods at their highest point during transfer. Thus, our past practice of maintaining the proper refueling water level exceeds the NRC recommendation.

This requirement is not at present part of our Technical Specification. Our Technical Specifications will be revised to include the requirements of maintaining at least 23 feet of water above the reactor vessel flange while in refueling mode and our appropriate refueling procedures will be revised to include this minimum level requirement.

Very truly yours,

L. D. White, Jr.

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