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FACIL: 50-244 Robert Emmet Ginna Nuclear Plant, Unit 1, Rochester G 05000244

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MECREDY, R.C. Rochester Gas & Electric Corp.  
RECIP. NAME: RECIPIENT AFFILIATION  
JOHNSON, A.R. Project Directorate I-3

SUBJECT: Discusses util implementation of TS improvement program for  
plant. Informs that meeting w/NRC in future to discuss  
program & schedule.

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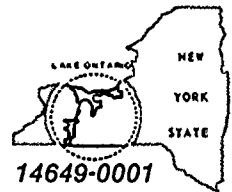
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February 28, 1994

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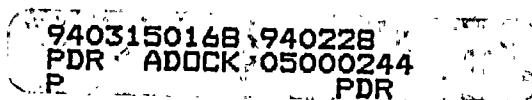
Subject: Conversion to Improved Technical Specifications  
R. E. Ginna Nuclear Power Plant  
Docket No. 50-244

Dear Mr. Johnson:

Rochester Gas and Electric (RG&E) previously submitted a letter to the NRC concerning the potential for converting the Ginna Station Technical Specifications, as a whole or in part, to the Improved Technical Specification (ITS) format (Reference a.). This was followed by a meeting with the NRC OTSB on October 18, 1993, to discuss a proposed conversion approach and to request additional information. The NRC staff provided the requested information in Reference b. RG&E and the NRC staff subsequently met on February 3, 1994 (Reference c.) to further discuss the proposed approach. Based on these discussions and an internal cost benefit study, RG&E has decided to implement a Technical Specification Improvement Program (TSIP) for Ginna Station as follows:

- (1) The Ginna Station Technical Specifications (TS) will be converted to the ITS format (including the bases) as documented in NUREG-1431 (Reference d.) and as supplemented by industry accepted NUREG change packages which improve or correct errors within the NUREG. This conversion will be limited to the current Ginna Station TS requirements with additional requirements only added if RG&E believes they are necessary in order to provide a complete TS. RG&E will attempt to provide the NRC with as much background information and justification for not adding the remaining NUREG requirements using existing documentation from sources such as the Systematic Evaluation Program (SEP) and TMI Action Plan review. It is our understanding that the addition of any new requirements during the conversion process are subject to the backfit rule (Reference b., RG&E Question #2). RG&E will also implement several line-item improvements to relocate current TS requirements consistent with the TS Policy Statement during the conversion process. In addition, the TSIP will attempt to address any inconsistencies contained within the current Ginna TS. However, RG&E recognizes that all changes must be appropriately supported by the necessary safety and accident analyses.

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- (2) RG&E plans to submit a License Amendment Request (LAR) in order to support NRC approval and RG&E implementation prior to completion of the 1996 refueling outage which begins in March of that year. This is necessary since RG&E will be replacing steam generators and converting to an 18 month cycle during that outage. All TS issues related to the steam generator replacement and 18 month cycle will be addressed within the TSIP. The failure to meet the proposed schedule will most likely move the ITS implementation date to October 1997 which is the next scheduled refueling outage after steam generator replacement and would require additional LARs. RG&E desires to implement the conversion during a refueling outage period due to the significant changes which are expected by a conversion from custom TS. RG&E will request a meeting with the OTSB in the near future to determine the appropriate schedule which is necessary to meet the preferred implementation date.
- (3) In order to support the proposed schedule, RG&E will refrain from submitting future TS changes not related to the conversion effort unless requested by the NRC. This includes any submittals related to the new 10 CFR 20 rule and training requirements. RG&E also has submitted three LARs which have not yet received NRC approval related to the Permissive P-10 setpoint (Reference e.), PORV and Block Valve Reliability (Reference f.), and PORC membership requirements (Reference g.). RG&E proposes to address the Permissive P-10 setpoint during the TSIP. The PORV and Block Valve Reliability concern can also be addressed during the TSIP; however, it is RG&E's understanding that this will first require NRC resolution of the generic issue. RG&E intends to address PORC membership requirements by submitting a LAR which reformats the entire Administrative Controls section of TS consistent with Reference h. as discussed during the February 3rd meeting (Reference c.). RG&E expects to submit this LAR by April 1994.
- (4) The staff for the other Westinghouse 2-Loop plants (i.e., Kewaunee, Point Beach 1 and 2, and Prairie Island 1 and 2) have informed RG&E that they plan to actively participate in the Ginna conversion effort by: (a) reviewing their custom TS against the Ginna TS; (b) reviewing the proposed conversion chapters and providing comments; and (c) reviewing all background information and correspondence between RG&E and the NRC staff in order to identify and support potential improvements to their individual specifications.
- (5) Based on the meeting with the NRC on February 3, 1994 (Reference c.), RG&E understands that the TSIP will be considered a self assessment program similar to a design basis reconstitution effort. Therefore, all findings discovered during the TSIP related to the current Ginna Station TS will be considered with respect to 10 CFR 2, Appendix C, Section VII, B.



The TSIP will be implemented by a team consisting of individuals with licensing, operations, engineering and training backgrounds to ensure accuracy and to minimize the impact on Ginna operating organizations during the implementation process. RG&E looks forward to working with the NRC staff on this important project and will request a meeting with the OTSB in the near future to further discuss the TSIP and schedule. Please contact us if you have any questions in the interim. RG&E considers this letter documentation of the February 3, 1994 meeting minutes as was agreed upon at the conclusion of the meeting.

Very truly yours,

  
Robert C. Mecredy

References:

- a. Letter from R.E. Mecredy, RG&E, to A.R. Johnson, NRC, Subject: *Conversion to Standard Technical Specifications*, June 18, 1993.
- b. Letter from A.R. Johnson, NRC, to R.E. Mecredy, RG&E, Subject: *Summary of Meeting with Rochester Gas and Electric Corporation on October 18, 1993 - Revised Standard Technical Specifications for Ginna (TAC No. M86818)*, dated November 9, 1993.
- c. RG&E Meeting with NRC (C.A. Grimes and A.R. Johnson), Subject: *Technical Specification Improvement Program*, February 3, 1994.
- d. NUREG-1431, *Standard Technical Specifications, Westinghouse Plants*, September 1993.
- e. Letter from R.E. Smith, RG&E, to C. Stahle, NRC, Subject: *Application to Operating License, Change P-10 Permissive Setpoint*, dated December 22, 1988.
- f. Letter from R.E. Mecredy, RG&E, to A.R. Johnson, NRC, Subject: *Generic Letter 90-06, Resolution of Generic Issue 70, "Power Operated Relief Valve and Block Valve Reliability" and Generic Issue 94, "Additional Low-Temperature Overpressure Protection for Light-Water Reactors,"* dated September 15, 1992.
- g. Letter from R.E. Mecredy, RG&E, to A.R. Johnson, NRC, Subject: *Application for Amendment to Technical Specification 6.5.1, "Plant Operations Review Committee (PORC) Function,"* dated March 23, 1993.
- h. Letter from W.T. Russell, NRC, to Improved Technical Specification Owners Group Chairpersons, Subject: *Content of Standard Technical Specifications, Section 5.0, Administrative Controls*, dated October 25, 1993.

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xc: Mr. Allen R. Johnson (Mail Stop 14D1)  
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