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 JOHNSON,A.R. Project Directorate I-3

SUBJECT: Forwards TSIP, showing interfaces w/NRC to support NRC resource allocation, per request during 940311 telcon. Schedule identifies dates that util intends to submit individual ITS sections for preliminary NRC review.

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May 23, 1994

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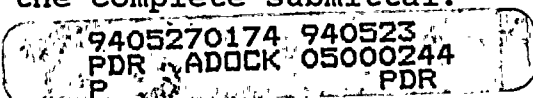
Subject: Technical Specification Improvement Program (TSIP)  
Schedule  
R.E. Ginna Nuclear Power Plant  
Docket No. 50-244

- References:
- (a) Letter from R.C. Mecredy, RG&E, to A.R. Johnson, NRC, Subject: "Conversion to Improved Technical Specifications", dated February 28, 1994.
  - (b) Teleconference Call Between RG&E (George Wrobel and Mark Flaherty) and NRC (Al Johnson, Chris Grimes, Bob Gramm, and Rick Fernandes), Subject: "Technical Specification Improvement Program", March 11, 1994.
  - (c) NUREG-1431, Standard Technical Specifications, Westinghouse Plants, September 1992.

Dear Mr. Johnson,

Rochester Gas and Electric (RG&E) notified the NRC in Reference (a) of our intent to convert to Improved Technical Specifications (ITS) for Ginna Station. Subsequent to this, a conference call was conducted between RG&E and the NRC (Reference b) to discuss several issues related to the Technical Specification Improvement Program (TSIP). During this conference call, RG&E was requested to submit a schedule for the TSIP to support NRC resource allocation. This letter provides the requested schedule.

RG&E has decided to develop the ITS for Ginna Station on a section-by-section basis. Individual ITS sections (e.g., ITS Section 3.2, Power Distribution Limits) will be prepared and technically reviewed within RG&E. Following the completion of this review, the proposed section, including the identification and justification of differences with NUREG-1431 (Reference (c)), will be provided to the NRC for preliminary review. The purpose of this step is to provide the NRC with the opportunity to communicate at an early stage any concerns with respect to differences from NUREG-1431. It is recommended that this be a relatively "high-level" review on the part of the NRC to allow resolution of potential significant concerns prior to the submittal of the complete technical specification package. Any remaining issues can be addressed after the complete submittal.



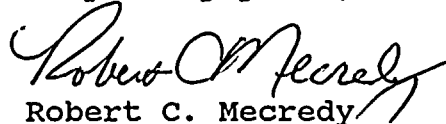


A copy of the TSIP schedule which shows all interfaces with the NRC staff is attached. A few clarifications with respect to the schedule are provided below:

- (1) The schedule identifies the dates that RG&E intends to submit individual ITS sections for preliminary NRC review. RG&E anticipates that a new ITS section will be submitted approximately every 3 weeks. RG&E requests that any NRC concerns or questions be raised within the 3 week window to prevent significant delays with respect to the final submittal. The use of conference calls or meetings is also encouraged to accelerate identification and resolution of NRC concerns, however, RG&E recognizes that all correspondence must be made publicly available.
- (2) The schedule includes a separate License Amendment Request (LAR) related to the Design Features ITS section. This section is being submitted for NRC approval independent of the remaining ITS sections in order to support use of higher enriched fuel for Cycle 25 (i.e., following the 1995 refueling outage). This LAR will be submitted in July 1994 with NRC approval required before RG&E receipt of new fuel from Westinghouse currently scheduled for early February 1995.
- (3) RG&E has decided to implement the ITS while at power to reduce any potential problem which could occur during a refueling outage. Due to the length and scope of the 1996 steam generator replacement and refueling outage, RG&E expects to be able to conduct additional operator training to support ITS implementation. Therefore, RG&E plans to implement the ITS a minimum of 2 weeks following completion of the 1996 refueling outage which is currently anticipated to end in early June 1996. Although dependant upon the final outage schedule, RG&E currently projects July 6, 1996 as the implementation date. RG&E will also consider implementation of the ITS prior to the refueling outage if NRC approval is obtained sufficiently early to allow for additional training and procedure/program changes. However, we would prefer to not implement the ITS less than 30 days prior to the 1996 refueling outage which is scheduled to begin on or about April 1, 1996.

Please do not hesitate to contact us if you have any questions with respect to the schedule or TSIP.

Very truly yours,

  
Robert C. Mecredy

MDF\609

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### TSIP (NRC Schedule)

[illegible]

### TSIP (NRC Schedule)

