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SUBJECT: Forwards listed documents for NRC review & approval prior to  
 submittal of improved TS consistent w/NUREG-1431.

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Vice President  
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May 5, 1995

U.S. Nuclear Regulatory Commission  
Document Control Desk  
Attn: Allen R. Johnson  
Project Directorate I-1  
Washington, D.C. 20555

Subject: Technical Specification Improvement Program  
Rochester Gas & Electric Corporation  
R.E. Ginna Nuclear Power Plant  
Docket No. 50-244

Dear Mr. Johnson,

Rochester Gas and Electric (RG&E) currently anticipates submitting the proposed conversion to Improved Technical Specifications (ITS) consistent with NUREG-1431 later this month. Included within this submittal are several changes to the existing technical specifications (TS) that are supported by engineering calculations or other documents that will require NRC Staff review and approval separate from the conversion review. Based on recent conversations, the NRC has requested that RG&E provide these documents prior to the ITS submittal to allow the NRC Staff additional time for review. Therefore, attached are the following documents:

- (a) "Criticality Analysis of the R.E. Ginna Nuclear Power Plant Fresh and Spent Fuel Racks, and Consolidated Rod Storage Canisters," dated June 1994.
- (b) WCAP-14040, "Methodology Used to Develop Cold Overpressure Mitigating System Setpoints and RCS Heatup and Cooldown Limit Curves," Revision 1, December 1994.
- (c) RG&E Methodology for Determining the Low Temperature Overpressure Protection System (LTOPS) Setpoints.

The spent fuel pool criticality study is required to support an increase in allowed fuel enrichment necessary to support a conversion to 18 month fuel cycles which is planned to begin following the 1996 refueling outage. An increased in fuel enrichment affects current Ginna Station TS 5.3.1.b and TS 5.4.

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The remaining two documents support the incorporation of a Pressure Temperature Limits Report (PTLR) which is planned to be implemented during the conversion to ITS. Since Ginna Station utilizes the LTOPS for preventing overpressurization of the residual heat removal system, Section 3.0 of WCAP-14040 does not apply to the installed system. Therefore, RG&E specific methodology is provided for your review. Both the RG&E specific methodology and a red-line markup of the methodology provided in WCAP-14040 are provided. All items proposed to be relocated from the current Ginna Station TS to the PTLR are addressed by these two documents.

The items RG&E anticipates to be relocated to the Core Operating Limits Report (COLR) are provided in attached Table 1. As can be seen from this table, NRC approved methodology exists for all items proposed to be relocated such that no documents require submittal to the NRC at this time.

The current schedule for implementation of the ITS for Ginna Station indicates NRC Staff approval of the proposed new TS by November 1995. Therefore, RG&E requests that NRC review of these three documents be coordinated to support this schedule.

Very truly yours,

  
Robert C. Mecredy

MDF\677

Attachments

xc: U.S. Nuclear Regulatory Commission  
Mr. Allen R. Johnson (Mail Stop 14B2)  
PWR Project Directorate I-1  
Washington, D.C. 20555

U.S. Nuclear Regulatory Commission  
Region I  
475 Allendale Road  
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Ginna Senior Resident Inspector

Table 1

## R.E. Ginna Proposed COLR Parameters

Ginna ITS	COLR Parameter	NRC Approved Methodology
3.1.1	Shutdown Margin Limits	WCAP-9272-P-A, Westinghouse Reload Safety Evaluation Methodology, July 1985
3.1.3	Moderator Temperature Coefficient - BOL limits	WCAP-9272-P-A, Westinghouse Reload Safety Evaluation Methodology, July 1985
3.1.3	Moderator Temperature Coefficient - EOL Limits	WCAP-9272-P-A, Westinghouse Reload Safety Evaluation Methodology, July 1985
3.1.5	Shutdown Bank Insertion Limit	WCAP-9272-P-A, Westinghouse Reload Safety Evaluation Methodology, July 1985
3.1.6	Control Bank Insertion, Sequence, and Overlap Limits	WCAP-9272-P-A, Westinghouse Reload Safety Evaluation Methodology, July 1985
3.2.1	Heat flux hot channel factor ( $F_0(Z)$ limits), $K(Z)$ curve, and equation	WCAP-9272-P-A, Westinghouse Reload Safety Evaluation Methodology, July 1985  WCAP-9220-P-A, Westinghouse ECCS Evaluation Model - 1981 Version, Rev. 1, February 1982
3.2.2	Nuclear Enthalpy Rise Hot Channel Factor ( $F_{AH}$ limit), power factor multiplier and equation	WCAP-9272-P-A, Westinghouse Reload Safety Evaluation Methodology, July 1985
3.2.3	AFD CAOC limits and target band	WCAP-9272-P-A, Westinghouse Reload Safety Evaluation Methodology, July 1985  WCAP-8385, Power Distribution Control and Load Following Procedures - Topical Report, September 1974



	COLR Parameter	NRC Approved Methodology
3.3.1	OT $\Delta$ T OP $\Delta$ T	WCAP-8745-P-A, Design Bases for the Thermal Overpower $\Delta$ T and Thermal Overtemperature $\Delta$ T Trip Functions, September 1986
3.4.1	DNB pressurizer pressure limit, RCS Tavg limit, and RCS total flow limit	WCAP-8567-P-A, Improved Thermal Design Procedure, February 1989  WCAP-11397-P-A, Revised Thermal Design Procedure, April 1989
3.5.1	Accumulator boron concentration	WCAP-9272-P-A, Westinghouse Reload Safety Evaluation Methodology, July 1985
3.5.4	RWST boron concentration	WCAP-9272-P-A, Westinghouse Reload Safety Evaluation Methodology, July 1985
3.7.12	Spent Fuel Pool Boron Concentration	WCAP-11596-P-A, PHOENIX-P/ANC Nuclear Design System for Pressurized Water Reactor Cores, June 1988
3.9.1	MODE 6/Refueling Boron Concentration	WCAP-9272-P-A, Westinghouse Reload Safety Evaluation Methodology, July 1985

Attachment A

Criticality Analysis of the R.E. Ginna Nuclear Power Plant  
Fresh and Spent Fuel Racks, and Consolidated Rod  
Storage Canisters

