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RECIP.NAME RECIPIENT AFFILIATION  
JOHNSON, A.R. Project Directorate I-1 (PD1-1) (Post 941001) *To Legit Specia.*

SUBJECT: Forwards application for amend to license DPR-18, revising  
TSS in entirety by converting to improved TSS.

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Vice President  
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May 26, 1995

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

Subject: Application for Amendment to Facility Operating License  
Conversion to Improved Technical Specifications  
Rochester Gas & Electric Corporation  
R.E. Ginna Nuclear Power Plant  
Docket No. 50-244

Dear Mr. Johnson,

The enclosed License Amendment Request (LAR) proposes to revise the Ginna Station Technical Specifications in its entirety by converting to Improved Technical Specifications (ITS). This LAR also proposes to revise the Ginna Station Operating License. The proposed application is consistent with the original purpose of the Technical Specification Improvement Program as outlined in Reference (a). The technical specification changes withdrawn by Reference (b) are also addressed in this LAR. In addition, the changes requested by Reference (c) are included within this submittal (i.e., this LAR does not supersede Reference (c) but is consistent with the changes being requested).

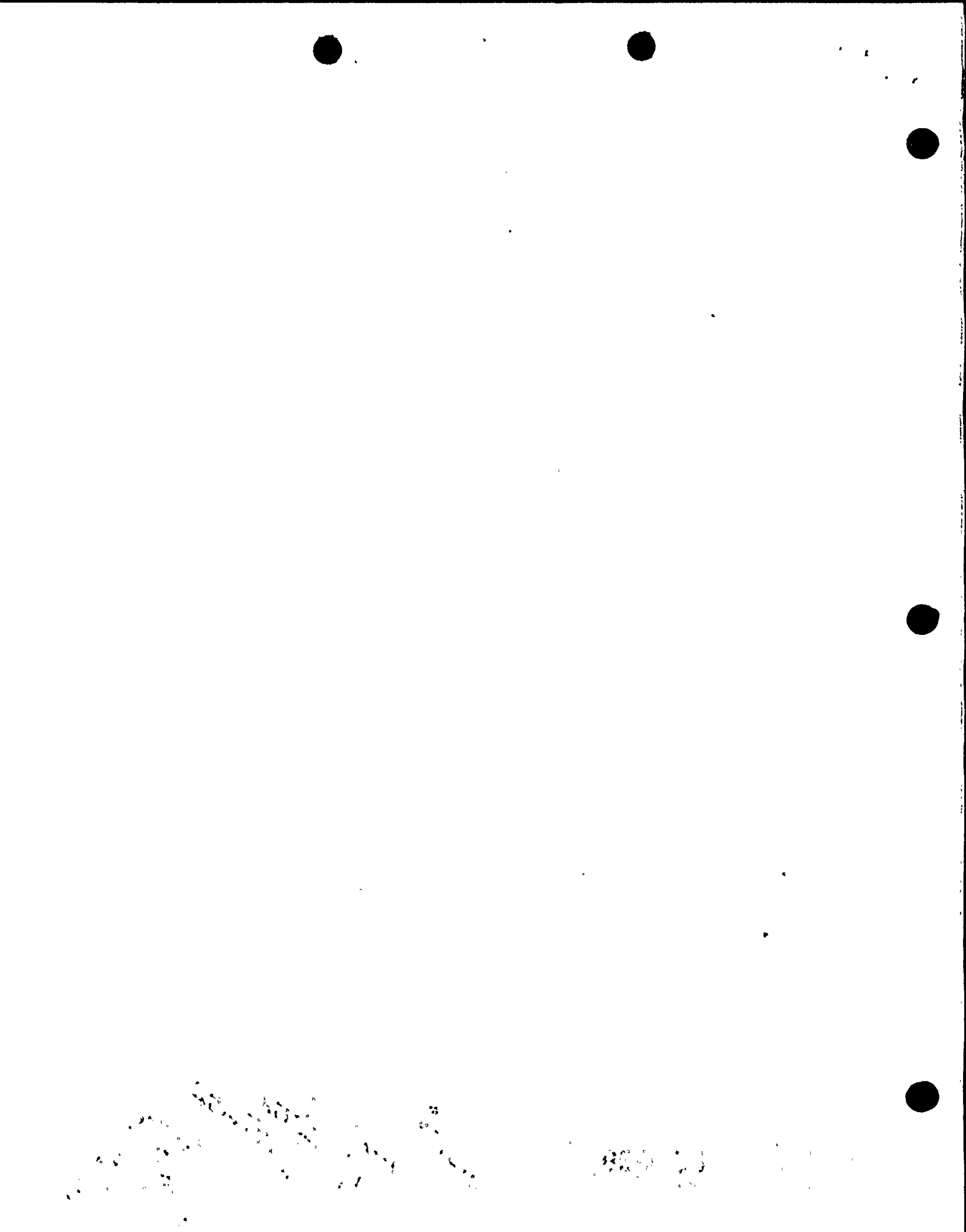
The proposed ITS contained in this LAR are based on the current Ginna Station Technical Specifications (through Amendment No. 59), NUREG-1431 (Ref. (d)), and other documents. The proposed ITS Limiting Conditions for Operations (LCO) or Surveillance Requirements (SRs) which are less restrictive than the current Ginna Station Technical Specifications (TS) and which are not consistent with NUREG-1431 are listed below (LCOs and SRs are those listed in Attachment C to this letter):

- a. All refueling interval surveillances were changed from 18 months to 24 months consistent with the guidance of Generic Letter 91-04 (Ref. (e)).
- b. Allow both post-accident charcoal filters to be removed from service at the same time provided that both containment spray trains are OPERABLE (LCO 3.6.6 and current Ginna Station TS 3.3.2.2).
- c. Only require one component cooling water heat exchanger to be OPERABLE when the system is required to be OPERABLE (LCO 3.7.7 and current Ginna Station TS 3.3.3.1).

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- d. Allow both motor driven auxiliary feedwater (AFW) pumps to be removed from service for up to 72 hours (LCO 3.7.5 and current Ginna Station TS 3.4.2.1.b).
- e. Increase the allowed outage times for certain reactor trip system and engineered safety feature actuation system functions up to 72 hours (LCO 3.3.1, LCO 3.3.2, and current Ginna Station TS 3.5.1 and 3.5.2).
- f. Allow an additional 48 hours to restore an inoperable reactor trip breaker or Automatic Trip Logic train in MODES 3, 4, and 5 after exiting MODE 2 with this condition (LCO 3.3.1 and current Ginna Station TS 3.5.1).
- g. Allow the use of a closed system to isolate a containment penetration with a failed containment isolation valve (LCO 3.6.3 and current Ginna Station TS 3.6.3).
- h. Only require one offsite power source to be OPERABLE during MODE changes (LCO 3.8.1 and current Ginna Station TS 3.7.2.1.b.2, 3.7.2.2.a, and 3.7.2.2.b).
- i. Allow 72 hours to reduce the Power Range Neutron Flux trip Function setpoint when  $F_Q$  or  $F_{\Delta H}$  is not within limits (LCO 3.2.1, LCO 3.2.2, and current Ginna Station TS 3.10.2.2).
- j. Remove the requirement to test certain reactor coolant system pressure isolation valves when the plant has been in cold shutdown for > 7 days (SR 3.4.14.1 and current Ginna Station TS 4.3.3.1).
- k. Remove the requirement to test the motor driven AFW pump cross-over motor operated isolation valves (LCO 3.7.5 and current Ginna Station TS 4.8.3).
- l. Remove the requirement to verify that the AFW pumps and valves can actuate within 10 minutes (LCO 3.7.5 and current Ginna Station TS 4.8.10).
- m. Increase the allowed tolerances for the pressurizer safety valves setpoint (LCO 3.4.10 and current Ginna Station TS 3.3.1.3.a).
- n. Increase the allowed fuel enrichment limit from 4.25 weight percent to 5.05 weight percent (Specification 4.3.1.1.a and current Ginna Station TS 5.3.1.b).
- o. Relocate the following parameters and setpoints to the Core Operating Limits Report:
  - i. Overpower  $\Delta T$  and Overtemperature  $\Delta T$  parameters (LCO 3.3.1 and current Ginna Station TS 2.3.1.2.d and 2.3.1.2.e).
  - ii. Refueling water storage tank (RWST) boron concentration (LCO 3.5.4 and current Ginna Station TS 3.3.1.1.a and 3.3.1.2).
  - iii. Accumulator boron concentration (LCO 3.5.1 and current Ginna Station TS 3.3.1.1.b and 3.3.1.3).



- iv. SHUTDOWN MARGIN (LCO 3.1.1 and current Ginna Station TS 3.10.1.1 and Figure 3.10-2).
- p. Relocate the containment integrity requirements during refueling (i.e., MODE 6) from the technical specifications (current Ginna Station TS 3.5.2, 3.5.5, and 3.8.1.a).
- q. Relocate the Reactor Coolant Pump Underfrequency trip Function from technical specifications (current Ginna Station TS 2.3.1.2.g and 3.5.1).
- r. Relocate the AFW and Standby AFW system manual initiation functions from technical specifications (current Ginna Station TS 3.5.2).

The above changes, while different from NUREG-1431 and the current Ginna Station TS, are consistent with the Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors (Ref. (f)) and the accident analyses. The changes are discussed in detail in Attachment A.

Revision 0 of NUREG-1431 was used for the preparation of this LAR since Revision 1 has only recently been issued. However, all approved Travellers which were used to generate Revision 1 are addressed in this submittal. The only exception is Traveller BWR-26, C.1 related to LCO 3.0.4. This Traveller has not been generically evaluated for the Westinghouse plants as required by the Reviewer's Note added as part of this approved Traveller. Therefore, RG&E has elected to defer implementation of this Traveller until after this evaluation has been performed.

We request that NRC approval of this LAR be provided by November 20, 1995. This approval date is required to support an implementation date in February 1996 since included within this LAR is a change in the allowed fuel enrichment limit. This enrichment limit is being changed to support conversion to 18 month refueling cycles with the new fuel scheduled to be shipped by Westinghouse beginning in February 1996. The technical evaluation of this change in enrichment was previously submitted to the NRC by Reference (g).

With an implementation date in February 1996, all surveillances as proposed in Attachment C will be current with the following exceptions:

- a. SR 3.6.6.13 - This requires a verification every 5 years of the spray additive flow rate through each eductor path. The current Ginna Station TS do not contain this requirement. However, recirculation flow from the RWST through the eductors is performed monthly. In addition, sample lines associated with the spray additive tank have not previously demonstrated blockage. A review of industry events related to the spray additive tank also did not reveal any concerns with respect to blockage.
- b. SR 3.7.3.1 - This requires a verification every 24 months that each main feedwater pump discharge valve (MFPDV) can close within 80 seconds following receipt of an actual or simulated signal. The current Ginna Station TS do not contain this requirement. However, the MFPDVs were last tested on April 14, 1992 with one valve closing in 73.1 seconds and the second valve closing in 75.9 seconds. These values are within the 80 second limit and provide assurance of the MFPDVs OPERABILITY.



Based on the above information, RG&E requests that these SRs be deferred until the refueling outage scheduled to begin by April 1, 1996.

RG&E would like to note that we have requested an exemption to 10 CFR 50, Appendix K, Sections I.D.3 and I.D.5 with respect to upper plenum injection issues (Ref. (h)) which, when approved, would result in a change to the Ginna Station license. This change is not addressed, or otherwise included within this LAR.

The final implementation date will be coordinated with the NRC following final approval of this LAR. Any questions related to this LAR should be directed to Mark Flaherty at (716) 724-8512.

Very truly yours,

  
Robert C. Mecredy

MDF\612  
Attachments

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) Letter from R.C. Mecredy, RG&E, to A.R. Johnson, NRC, Subject: *License Amendment Application Requests*, dated April 26, 1995.
- (c) Letter from R.C. Mecredy, RG&E, to A.R. Johnson, NRC, Subject: *Application for Amendment to Operating License Reactor Coolant Activity Technical Specifications*, dated May 23, 1994.
- (d) NUREG-1431, *Standard Technical Specifications, Westinghouse Plants*, Revision 0, September 1993.
- (e) Generic Letter 91-04, *Changes in Technical Specification Surveillance Intervals to Accommodate a 24-Month Fuel Cycle*, dated April 2, 1991.
- (f) NRC, *Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors*, dated July 21, 1993.
- (g) Letter from R.C. Mecredy, RG&E, to A.R. Johnson, NRC, Subject: *Technical Specification Improvement Program*, dated May 5, 1995.
- (h) Letter from R.C. Mecredy, RG&E, to A.R. Johnson, NRC, Subject: *Request for Exemption to Selected 10 CFR Part 50, Appendix K Requirements*, dated November 5, 1992.



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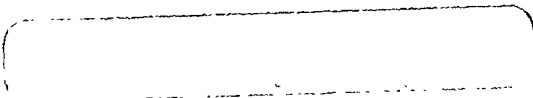
UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of )  
Rochester Gas and Electric Corporation ) Docket No. 50-244  
(R.E. Ginna Nuclear Power Plant) )

APPLICATION FOR AMENDMENT TO OPERATING LICENSE

Pursuant to Section 50.90 of the regulations of the U.S. Nuclear Regulatory Commission (NRC), Rochester Gas and Electric Corporation (RG&E), holder of Facility Operating License No. DPR-18, hereby requests that the license and the Technical Specifications set forth in Appendix A to that license be amended. This request for change is to convert the entire Technical Specifications to Improved Technical Specifications format. Several requirements are also relocated to other programs and documents in accordance with the criteria contained in the NRC Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors.

A description of the amendment request, necessary background information, justification of the requested change, and no significant hazards and environmental considerations are provided in Attachment A. This evaluation demonstrates that the proposed changes do not involve a significant change in the types or a significant increase in the amounts of effluents or any change in the authorized power level of the facility. The proposed changes also do not involve a significant hazards consideration.





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