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FACIL:50-244 Robert Emmet Ginna Nuclear Plant, Unit 1, Rochester G 05000244 P
AUTH.NAME AUTHOR AFFILIATION
MECREDY,R.C. Rochester Gas & Electric Corp. *See Proposed Change*
RECIP.NAME RECIPIENT AFFILIATION *In Tech Specs.*
JOHNSON,A.R.

SUBJECT: Forwards application for amends to license DPR-18,proposing
TS to implement WCAP-10271,its assoc suppl & other re
changes w/respect to RTS & ESFAS.

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ROBERT C. MECREDY
Vice President
Nuclear Operations

August 31, 1995

U.S. Nuclear Regulatory Commission
Document Control Desk
Attn: Allen R. Johnson
Project Directorate I-3
Washington, D.C. 20555

Subject: Changes to Technical Specification Instrumentation Requirements
Conversion to Improved Technical Specifications
Rochester Gas & Electric Corporation
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Johnson,

By Reference (a), RG&E proposed to convert the current Ginna Station Technical Specifications to the Improved Standard Technical Specifications (i.e., NUREG-1431). Included within this conversion were numerous changes to the current requirements for the Reactor Trip System (RTS) and Engineered Safety Features Actuation System (ESFAS). Several of these changes were based on Reference (b), which if approved, would allow up to 72 hours to place inoperable RTS and ESFAS channels in the tripped condition and allow the bypass of an inoperable channel for up to 12 hours. Based on conversations with NRC staff, RG&E has agreed to defer these changes until after the conversion process since WCAP-14333 has not yet received staff review and approval. In place of the changes justified by WCAP-14333, RG&E proposes to implement those documented in References (c), (d), and (e) which have received NRC staff review and generic approval.

The purpose of this submittal is to provide the necessary justification to implement the changes to the RTS and ESFAS surveillance requirements and required actions as documented in WCAP-10271 and its supplements. In order to support NRC review of this change, this submittal is organized as follows:

- a. The implementation of WCAP-10271 and other related changes is documented in this submittal as a separate license amendment request (LAR) with respect to the current Ginna Station Technical Specifications. Therefore, the required plant specific justification of this implementation and significant hazards consideration are provided in this submittal.


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- b. The implementation of WCAP-10271 and other related changes and the removal of WCAP-14333 with respect to Reference (a) is being provided for the marked up Ginna Station Technical Specifications only (i.e., Attachment A and B to Reference (a) has been revised to show the resulting differences). The necessary changes to the NUREG-1431 markups (Attachment D to Reference (a)) and the proposed Improved Technical Specifications for Ginna Station (Attachment C to Reference (a)) will be provided at a later date.

Based on the above, the review of this submittal should be coordinated with the overall NRC review of the May 26, 1995 submittal since they are interrelated.

Very truly yours,


Robert C. Mecredy

MDFV749
Attachments

References:

- (a) Letter from R.C. Mecredy, RG&E, to A.R. Johnson, NRC, Subject: *Application for Amendment to Facility Operating License, Conversion to Improved Technical Specifications*, dated May 26, 1995.
- (b) WCAP-14333, *Probabilistic Risk Analysis of the RPS and ESFAS Test Times and Completion Times*, May 1995.
- (c) WCAP-10271-P-A, *Evaluation of Surveillance Frequencies and Out of Service Times for the Reactor Protection Instrumentation System*, May 1986.
- (d) WCAP-10271-P-A, Supplement 1, *Evaluation of Surveillance Frequencies and Out of Service Times for the Reactor Protection Instrumentation System*, May 1986.
- (e) WCAP-10271-P-A, Supplement 2, Revision 1, *Evaluation of Surveillance Frequencies and Out of Service Times for the Engineered Safety Features Actuation System*, June 1990.

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