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 MECREDY,R.C. Rochester Gas & Electric Corp.
 RECIP.NAME RECIPIENT AFFILIATION
 JOHNSON,A.R.

SUBJECT: Submits conversion to improved Tech Specs re 24 month refueling cycles.

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ROBERT C. MECREDY
Vice President
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November 30, 1995

U.S. Nuclear Regulatory Commission
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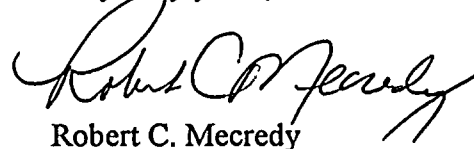
Subject: Conversion to Improved Technical Specifications, 24 Month Refueling Cycles
Rochester Gas & Electric Corporation
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

Reference: (a) Letter from R.C. Mecredy, RG&E, to A.R. Johnson, NRC, Subject:
Conversion to Improved Technical Specifications, dated May 26, 1995.

Dear Mr. Johnson,

By Reference (a), RG&E proposed to change the definition of refueling interval from 18 months to 24 months as part of the conversion to improved technical specifications for Ginna Station. Attachment H of Reference (a) contains discussion related to the impact of the refueling interval change on instrumentation and mechanical equipment at Ginna Station. Section D.3 and Table 4 of this attachment evaluate the change with respect to the reactor trip system, ESFAS, and other miscellaneous components. Section D.3 makes a statement that "Ginna Station has not observed failures of these functions during previous testing." This statement was based on a review of plant records associated with the tests listed on Table 4 between January 1985 and January 1995. This review, and a similar review of NPRDS records, did not indicate any failures of the subject components during this time frame. As such, RG&E believes that historical data supports a increased testing frequency of 24 months. Please contact Mark Flaherty at (716) 724-8512 if you have any further questions.

Very truly yours,



Robert C. Mecredy

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Attachments

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Ginna Senior Resident Inspector

