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

*See Proposed Change to
 Sect. Specs.*

SUBJECT: Forwards revised info re 950526 application for amend to
 license for conversion to improved STSS, per discussions w/
 NRC.

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ROBERT C. MECREDY
Vice President
Nuclear Operations

December 28, 1995

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

Subject: Application for Amendment to Facility Operating License
Conversion to Improved Standard Technical Specifications
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: *Application for Amendment to Facility Operating License, Conversion to Improved Technical Specifications*, dated May 26, 1995.
 - (b) Letter from A.R. Johnson, NRC, to R.C. Mecredy, RG&E, Subject: *Summary of Meeting with Rochester Gas and Electric Corporation on Technical Specification Improvement Program - November 13-17, 1995*, dated December 1, 1995.
 - (c) Letter from R.C. Mecredy, RG&E, to A.R. Johnson, NRC, Subject: *License Amendment Request, Reactor Coolant System Vents*, dated July 27, 1995.

Dear Mr. Johnson,

By Reference (a), RG&E submitted a license amendment request (LAR) which proposed to convert the Ginna Station Technical Specifications in their entirety to the Improved Standard Technical Specifications (ISTS). During the course of NRC review of this submittal, numerous changes have been requested by the NRC Staff and agreed upon by RG&E. Therefore, enclosed please find the following attachments which replace those attachments to the May 26, 1995 submittal:

1. Attachment A, Sections D, E, F, and G (change justifications and no significant hazards evaluation);

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2. Attachment B (marked up version of current Ginna Station Technical Specifications and License); and
3. Attachment C (proposed ITS for Ginna Station - Draft B).

In addition, the following new Attachments are enclosed:

1. Attachment I ("redlined" version of Attachment A [Sections D, E, F, and G] to May 26, 1995 submittal);
2. Attachment J (documentation of changes to May 26, 1995 submittal);
3. Attachment K (response to NRC questions contained in Reference (b));
4. Attachment L ("redlined" version of Attachment C to May 26, 1995 submittal); and
5. Attachment M (location of relocated current technical specifications).

We request that NRC approval of this LAR be provided by January 12, 1996. This approval date is required to support an implementation date prior to February 9, 1996 which is the scheduled receiving date for the new fuel being shipped by Westinghouse in support of the change to 18 month fuel cycles.

Implementation of the ITS requires numerous procedure changes to reflect new and different requirements. All documentation associated with these procedure changes will be maintained as auditable records in accordance with the Ginna Station Quality Assurance Program record retention requirements. For those procedures which are not revised prior to implementation, RG&E will develop a schedule for their update.

Implementation of the ITS also involves relocation of several current technical specification requirements to other licensee controlled documents. For items which have been relocated to the UFSAR, RG&E commits to confirm that the necessary details are appropriately reflected in the next scheduled UFSAR update. For all other items which have been relocated, RG&E commits to confirm that these details are appropriately reflected in the associated documents specified in Attachment M prior to implementation.

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

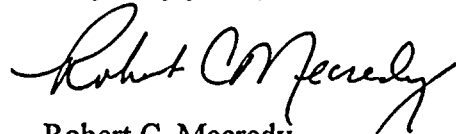
- a. SR 3.6.6.17 - This requires a verification every 5 years of spray additive flow through each eductor path. The current Ginna Station TS do not contain this requirement. However, recirculation flow from the RWST through the eductors is performed monthly. In addition, sample lines associated with 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.
- c. SR 3.3.2.7 - This requires a performance of a ACTUATION LOGIC TEST for the Steam Line Isolation function. This test is a verification of all possible logic combinations for the Steam Line Isolation function. However, the verification of the coincident safety injection signal has not been performed. The current Ginna Station TS do not contain this requirement. All other possible combinations were tested during the 1995 refueling outage.
- d. SR 3.5.1.4 and SR 3.5.4.2 - These require verification that the boron concentrations for the accumulator are within limits every 31 days on a STAGGERED TEST BASIS and the RWST every 7 days, respectively. The boron concentration values provided in the proposed ISTS are for 18 month refueling cycles which will be implemented following startup after the steam generator replacement outage. These values are more conservative than current technical specification limits. Requiring that the 18 month cycle limits be met upon implementation (which is before the steam generator replacement outage) presents several operational concerns. First, the safety injection pumps are used to fill the accumulators and to change boron concentration. Due to the limited range in which the accumulator level must be maintained per technical specifications, it is estimated that the accumulator would have to be partially drained and filled numerous times (approximately 50) to meet the new limits. Also, the safety injection pumps would have to be operated for several hours on low recirculation flow during this activity. This presents reliability concerns with operating the safety injection pumps for long durations on recirculation flow only. With respect to the 300,000 gallon RWST, the method of changing boron concentration is via a 60 gpm pump. This activity is expected to take several weeks to accomplish. Therefore, RG&E proposes that these surveillances be deferred and that the existing boron concentration limits for 12 month cycles be controlled in plant procedures in the interim.

- e. SR 3.5.2.7 - This requires a verification every 24 months that each RHR containment sump suction inlet is not restricted by debris and the containment sump suction screen shows no evidence of structural distress or abnormal corrosion. The current Ginna Station TS do not contain this requirement. The design of the Ginna Station containment sump includes the use of two suction screens, one located above the sump and a finer mesh screen located above the RHR suction inlet. Therefore, to inspect the RHR suction inlet lines, both screens would have to be removed. This was last performed in 1993. However, due to the design of this screen, it is not credible for any debris to circumvent the screen. Inspections of the screens themselves is performed following each refueling outage as a standard housekeeping practice.

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

Finally, by Reference (c), RG&E had requested that a license amendment request (LAR) related to Reactor Coolant System (RCS) vents dated September 15, 1995 be considered in the conversion to ISTS. This LAR had previously been withdrawn by RG&E such that Reference (c) rescinded the withdraw request. However, RG&E hereby removes this request and asks that the technical specifications for RCS vents proposed in Reference (a) be considered instead.

Very truly yours,


Robert C. Mecredy

Subscribed and sworn to before me
on this 28th day of December 1995.

Marie C. Villeneuve
Notary Public

MARIE C. VILLENEUVE
Notary Public, State of New York
Monroe County
Commission Expires October 31, 1996

$$V_{\ell}^{\pm} = \frac{1}{2} \left(V_{\ell}^{\pm} + V_{\ell}^{\pm} \right)$$

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Attachments

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