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 FACIL: 50-244 Robert Emmet Ginna Nuclear Plant, Unit 1, Rochester G 05000244
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 MECREDY, R.C. Rochester Gas & Electric Corp.
 RECIP. NAME RECIPIENT AFFILIATION
 GRIMES, C.I. NRC - No Detailed Affiliation Given

SUBJECT: Submits recommendations for NRC consideration, per GL 89-01 & NUREG-1431 re conversion to improved STS.

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ROBERT C. MECREDY
Vice President
Nuclear Operations

April 1, 1996

U.S. Nuclear Regulatory Commission
Mr. Chris I. Grimes
Chief, Technical Specifications Branch
Mail Stop 011E22
Washington, D.C. 20555

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

Dear Mr. Grimes,

As you are aware, RG&E implemented the improved technical specifications (ITS) for Ginna Station on February 24, 1996. Subsequent to this implementation, you contacted Mr. George Wrobel, Manager of Nuclear Safety and Licensing and asked if RG&E would be willing to provide recommendations for future technical specification conversion efforts. The purpose of this letter is to transmit several recommendations for your consideration (see attached). We hope that these suggestions will be beneficial.

RG&E would also like to take this opportunity to thank you and your staff for their effort with respect to converting the Ginna Station "custom" technical specifications to the ITS. This was a very large undertaking by both RG&E and the NRC and we very pleased with the final product. RG&E would like to expressly state our appreciation for Mr. Carl Schulten of your staff. His thoroughness and attention to detail were commented upon by numerous members of the Ginna Station plant staff. Mr. Schulten's willingness to learn and understand the design differences between Ginna Station and the plant used in the development of NUREG-1431 was commendable. Also, he was amenable to consideration of so-called "generic" changes to NUREG-1431 which was evidence of his desire to ensure a technically correct and quality document for Ginna Station. In those instances where Mr. Schulten requested that RG&E revise the licensing basis to more up-to-date standards (e.g., regulatory guides), it was made in a very professional manner with a rational basis such that at no time did he appear to be "forcing" RG&E to accept the change. In summary, RG&E found Mr. Schulten to be an excellent reviewer who was very knowledgeable about a wide variety of topics and issues.

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You also requested that RG&E provide a cost estimate of the conversion process. While the numbers below include some estimates, they can be considered close to the real cost. Consultant related manhours (MH) are also included; however, NRC review costs are not provided since these have not yet been submitted to RG&E.

- a. Preparation of original license amendment request (LAR) - 8,200 MH
- b. Support of NRC review of the LAR and preparation of final submittal - 3,400 MH
- c. Plant costs to implement (does not include future changes required to complete conversion - e.g., complete update procedure references to ITS) - 8,800 MH
- d. Material and travel costs - \$40,000

Finally, enclosed is a picture of Ginna Station as requested by Mr. Schulten for the TSB display of converted plants.

Thank you for the opportunity to provide the attached recommendations. If you have any further questions related to these matters, please do not hesitate to contact either Mr. Wrobel at (716) 724-8070 or Mr. Mark Flaherty at (716) 724-8512.

Very truly yours,


Robert C. McCreedy

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Attachment

Recommendations for Future Conversions

1. The Ginna Station conversion effort was complicated by the fact that not only was a conversion to ITS being made, but several line item improvements and technical changes were rolled into the project. This included implementation of WCAP-10271 (i.e., TOPS), a change to pressurizer safety valve setpoints, reactor coolant specific activity limits and implementation of Generic Letter 89-01 (Radiological Effluents relocation). While these changes were in part driven by the vintage of the previous Ginna Station technical specifications, it complicated, and in some cases delayed, the conversion effort. As such, RG&E would suggest that other licensees be recommended to submit these "beyond conversion" changes separate from the conversion effort. As a minimum, the licensees could mark up their existing technical specifications with the necessary justifications in a separate license amendment request and ask that the requested changes be implemented as part of ITS if they do not need them immediately.
2. It is recognized that the generic process for changes to the ITS NUREGs was evolving during the time frame in which RG&E converted the Ginna Station technical specifications. And to some degree, this generic process will continue to evolve as more plants convert to ITS. The generic process requires significant resources on part of both the industry and the NRC in order to obtain consensus of all parties involved. While RG&E does not have any real recommendations for improving this process, we feel that NRC management should be made aware that the ITS NUREGs are really a living document that will continue to change as more plants convert and find problems or potential clarifications. Unfortunately, this requires resources which were typically assigned at the last moment during our conversion process resulting in delays and some uncertainty. Licensees should also be strongly encouraged to participate in this generic process from the very beginning of their conversion efforts to help reduce these scheduling problems.
3. RG&E provided electronic copies of the Ginna Station UFSAR, technical specifications, and conversion LAR to our lead TSB reviewer at the beginning of the project. We believe that these were very useful to the NRC during the review process (based on the questions which arose from them) and would recommend that future conversion projects provide them if available.
4. RG&E developed simple flow diagrams of plant systems which contained information of what we believed was addressed by a proposed LCO for use during the review process. These were eventually added to the Ginna Station bases "for illustration purposes" only but provided an easy starting point from which to have discussions with the NRC reviewer. While every licensee may not want these figures in their bases due to controlled drawing issues, having them during the review process would be of great benefit to both the licensees and the NRC.



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5. The criteria for what must be contained within technical specifications is defined in 10 CFR 50.36. However, during the Ginna Station conversion process, it was evident that the criteria were not fully understood by NRC branches outside the TSB, and to some degree by NRC consultants. This was demonstrated both during the conversion process and subsequent to implementation with respect to NRC inspectors. It is recommended that this understanding be increased within the NRC.
6. The conversion of a licensee's technical specification to ITS requires much coordination between the Technical Specification Branch (TSB) and Projects. Essentially, the TSB is responsible for ensuring the new ITS are technically correct while Projects is responsible for coordinating other NRC branches to provide necessary support, including taking the final product through management for formal NRC approval. This coordination effort should be performed in parallel to the greatest degree possible to support scheduling needs and to ensure a quality document. In addition, both the TSB and Projects are required for a conversion. That is, a conversion to ITS requires a strong knowledge of how to use the ITS NUREGs and the history behind why the documents are written and formatted as they are. This expertise can be provided by the TSB as was demonstrated during the Ginna Station conversion effort when RG&E attempted to make several changes that were different from the ITS. The TSB acknowledged that we were attempting to do the "right thing," however, our proposed method was inconsistent with the document usage rules. As such, RG&E either accepted the NUREG wording with a greater understanding of the ITS or a compromise was reached. RG&E believes that one of the main reasons that our conversion was successful was the lead that the TSB took in reviewing the proposed ITS for Ginna Station. Someone new to ITS may not be able to provide the ITS knowledge that is required as was shown by the NRC's use of consultants who were technically knowledgeable of plant systems but did not have a strong ITS background.

In the same way, strong support from Projects is required to ensure that if other NRC branches are required to be involved, they work with and support the TSB to the greatest degree possible. Requiring the technical branch reviewing the ITS to also perform this activity could be very burdensome as was discovered during the Ginna Station conversion effort. As such, RG&E would recommend that NRC management be made aware of the resource requirements from both the TSB and Projects necessary to support a conversion effort, especially since only a small minority of the plants have converted to date. Requiring periodic meetings (or conference calls) between the licensee, Projects, and the TSB would also be recommended during the NRC's review of the licensee's submittal.