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VISSING,G.S.

See Proposed Change To Tech Specs

SUBJECT: Forwards application for amend to license DPR-18 & TS.Rev to RCS PT limits rept re administrative controls requirements.

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Vice President
Nuclear Operations

April 24, 1997

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

Subject: Application for Amendment to Facility Operating License, Revision to Reactor Coolant System (RCS) Pressure and Temperature Limits Report (PTLR) Administrative Controls Requirements
Rochester Gas & Electric Corporation
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Vissing,

By Reference (a), RG&E submitted a license amendment request (LAR) with respect to Administrative Controls Section 5.6.6 of the Ginna Station Technical Specifications. This LAR was intended to update the Ginna Station PTLR and revise the necessary Administrative Control requirements such that the PTLR would come under licensee control (i.e., future changes to the PTLR would be permitted in accordance with the methodology specified in the Administrative Controls section).

Following NRC review of that LAR, questions arose with respect to the low temperature overpressure protection (LTOP) system enable temperature specified in the PTLR. Specifically, the NRC identified that the determination of the LTOP enable temperature required consideration of RCS liquid temperature measurement accuracy per the methodology currently specified in Specification 5.6.6. RG&E agreed to address this concern by first submitting a relief request (Ref. (b)) and then by requesting an exemption to applicable regulations (Ref. (c)). Subsequently, the NRC notified RG&E that RCS liquid temperature accuracy should instead be addressed by a LAR which updated the methodology in Specification 5.6.6. Consequently, the purpose of this LAR is to replace the LAR submitted as Reference (a) in its entirety in order to both place the PTLR under licensee control and to provide a new LTOP enable temperature methodology. As a result, the exemption request provided in Reference (c) is hereby withdrawn since this LAR provides the necessary changes.

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In summary, consistent with Generic Letter 96-03, this letter provides the following:

a. An LAR (Attachments I, II, and III) which revises Administrative Controls Section 5.6.6 to perform the following:

   i. Replace the reference to the May 23, 1996 NRC letter (which is the basis for the existing LTOP and pressure / temperature (P/T) limits) with a new reference containing the NRC's approval of the first use of the LTOP methodology specified within the Administrative Controls section.

   ii. Implement necessary changes to place the PTLR under licensee control.

   iii. Update the list of documents containing the approved NRC methodology to reference WCAP-14040-NP-A for the P/T curves and this letter which contains the methodology for the LTOP setpoints and enable temperature (Attachment VI).

   iv. Correct a typographical error within the Administrative Controls.

b. Revision 2 of the PTLR (Attachment IV) which contains the following:

   i. Update of all reactor vessel material information as documented in WCAP-14684 (Attachment VIII).

   ii. The LTOP enable temperature using the methodology submitted as Attachment VI to this letter. Though the methodology would allow for the required LTOP enable temperature to be lowered (Attachment VII), RG&E has elected to keep the currently higher LTOP enable temperature shown in PTLR Section 2.2. The remaining LTOP setpoint and methodology remains unchanged as based on the calculation included as Attachment IV to Reference (d).

   iii. Update of the P/T curves based on the methodology of Reference (e) as documented in WCAP-14684 (Attachment VIII).

Please note that there is no change to WCAP-14684 and the PTLR (other than updates of the methodology references) from that provided in Reference (a).

Upon approval of this LAR, the PTLR will become a RG&E controlled document such that future changes will not require NRC approval as long as the methodology specified in the Administrative Controls section is used. Since the existing PTLR expires on July 1, 1997, RG&E requests NRC consideration of this LAR by June 15, 1997 in order to support necessary implementation.

Very truly yours,

Robert C. Mecredy

References:

(a) Letter from R.C. Mecredy, RG&E, to G.S. Vissing, NRC, Subject: *Application for Amendment to Facility Operating License, Revision to Reactor Coolant System (RCS) Pressure and Temperature Limits Report (PTLR)*, dated September 13, 1996.

(b) Letter from R.C. Mecredy, RG&E, to G.S. Vissing, NRC, Subject: *Request to Use ASME Code Case N-514 in the Determination of Low Temperature Overpressure Protection (LTOP) Enable Temperature*, dated December 18, 1996.

(c) Letter from R.C. Mecredy, RG&E, to G.S. Vissing, NRC, Subject: *Request for Exemption to 10 CFR 50.60 to Use American Society of Mechanical Engineers (ASME) Code Case N-514 in the Determination of Low Temperature Overpressure Protection (LTOP) Enable Temperature*, dated February 10, 1997.

(d) Letter from R. C. Mecredy, RG&E, to A. R. Johnson, NRC, Subject: *Application for Amendment to Facility Operating License Methodology for Low Temperature Overpressure (LTOP) Limits*, dated February 9, 1996.

(e) WCAP-14040-NP-A, *Methodology Used to Developed Cold Overpressure Mitigating System Setpoints and RCS Heatup and Cooldown Limit Curves* January 1996.

Attachments

xc: Mr. Guy S. Vissing (Mail Stop 14B2)
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