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 MECREDY, R.C. Rochester Gas & Electric Corp.
 RECIP. NAME RECIPIENT AFFILIATION
 VISSING, G.S.

*See Proposed
Change To
Tech Specs*

SUBJECT: Forwards application for amend to license DPR-18, revising
 Administrative Controls w/respect to Reactor Coolant Sys
 Pressure & Temp Limits Rept.

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Figure 1 is a line graph showing the percentage of total catch versus the number of hauls for two species, *A. balearicum* and *A. balearicum + A. balearicum + A. balearicum*. The x-axis is labeled 'Number of hauls' and ranges from 0 to 10. The y-axis is labeled 'Percentage of total catch' and ranges from 0 to 100. The line for *A. balearicum* starts at 100% for 1 haul and decreases to approximately 10% for 10 hauls. The line for *A. balearicum + A. balearicum + A. balearicum* starts at 100% for 1 haul and decreases to approximately 10% for 10 hauls.

[illegible]



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ROBERT C. MECREDY
Vice President
Nuclear Operations

September 29, 1997

U.S. Nuclear Regulatory Commission
Document Control Desk
At.: 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,

The purpose of this letter is to seek an amendment to the Facility Operating License to revise the specified methodology for determining the low temperature overpressure protection (LTOP) enable temperature setpoint, update the existing PTLR for various issues, and revise the Administrative Controls section to place future changes to the PTLR under licensee control.

The original license amendment request (LAR) related to this issue was submitted to NRC by Reference (a). As a result of subsequent correspondence between the NRC and RG&E (see References (b) through (d)), numerous changes were requested of the original LAR. Consequently, this submittal supersedes the Reference (a) LAR in its entirety and incorporates all changes requested in References (b) through (d). //
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Summarily, 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 of the Ginna Station Technical Specifications 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

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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 and pressure setpoint using the methodology submitted as Attachment VI to this letter. Though the methodology would allow for the LTOP enable temperature to be lowered (Attachment VII), RG&E has elected to keep the current conservative higher LTOP enable temperature shown in PTLR Section 2.2.
 - 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). A revised response to previous NRC questions concerning the LTOP methodology is also provided in Attachment IX (Ref. (b), Enclosure 3).

Upon approval of this LAR, the PTLR will become an 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 December 31, 1997, RG&E requests NRC consideration of this LAR by December 12, 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 April 24, 1997.
- (b) Letter from R.C. Mecredy, RG&E, to G.S. Vissing, NRC, Subject: *Clarifications to Proposed Low Temperature Overpressure Protection (LTOP) Technical Specification*, dated June 3, 1997.

- (c) Letter from R.C. Mecredy, RG&E, to G.S. Vissing, NRC, Subject: *Request for Exemption from 10CFR50.60, "Acceptance Criteria for Fracture Prevention for Light Water Nuclear Power Reactors for Normal*, dated June 12, 1997.
- (d) Letter from G.S. Vissing, NRC, to R.C. Mecredy, RG&E, Subject: *Exemption From the Requirements of 10 CFR Part 50.60, Acceptance Criteria for Fracture Prevention Measures for Lightwater Nuclear Power Reactors for Normal Operation - R.E. Ginna Nuclear Power Plant (TAC No. M98993)*, dated July 28, 1997.
- (e) WCAP-14040-NP-A, *Methodology Used to Developed Cold Overpressure Mitigating System Setpoints and RCS Heatup and Cooldown Limit Curves* January 1996.

MDF941

Attachments

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