

CATEGORY 1

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SUBJECT: Submits proposed changes to requirements for compensatory controls for plant LDS to support LBB application of RHR sys. Commitments made by util, listed.

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December 7, 1998



U.S. Nuclear Regulatory Commission
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Project Directorate I-1
Washington, D.C. 20555

Subject: Proposed Changes to the Requirements for Compensatory Controls for
Ginna's Leak Detection System to Support Leak-Before-Break (LBB)
Application of Portions of Ginna Residual Heat Removal (RHR) System
(TAC# MA0389)
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Vissing:

On November 20, 1998 at 10:00 AM, RG&E and NRC personnel held a telephone conference to discuss the availability of RG&E's RCS leak detection monitor, Containment Air Particulate Monitor R-11. NRC personnel were looking for a level of confidence in the monitor availability based on past experience. RG&E provided information during the teleconference that was based on reviewing the inoperable equipment control records for monitor R-11. The following is a listing of the percentage of time that R-11 was operable for a given year:

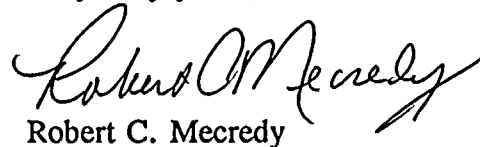
1995	97%
1996	98%
1997	92%
1998 (to date)	97%

During the teleconference it was suggested by the NRC that the required frequency for the performance of a RCS water inventory balance (SR 3.4.13.1) be increased when monitor R-11 is unavailable. Currently the Ginna Improved Technical Specifications require a water inventory balance every 72 hours under normal conditions or every 24 hours under certain conditions when containment leak detection system components are inoperable. RG&E has evaluated this suggestion and based on the importance of early RCS leakage detection to the leak-before-break methodology proposes the following commitments.

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- 1) A requirement will be added to the Ginna Technical Requirements Manual (TRM) to require either a RCS water inventory balance or analyses of containment atmosphere grab samples once within 12 hours and every 12 hours thereafter when monitor R-11 is unavailable while in MODES 1, 2, 3 and 4. This requirement will be in place prior to 12/31/98.
- 2) A License Amendment Request (LAR) will be submitted to the NRC to request revision of the Ginna Improved Technical Specifications to require either a RCS water inventory balance or analyses of containment atmosphere grab samples once within 12 hours and every 12 hours thereafter when monitor R-11 is unavailable while in MODES 1, 2, 3, and 4. This LAR will be scheduled for submittal prior to 5/1/99.

Very truly yours,


Robert C. Mecredy

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