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ROBERT C. MECREDY Vice President Nuclear Operations

September 27, 2000

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

Subject: Low Pressure Rotor Disc Inspections

Dear Mr. Vissing:

The purpose of this letter is to inform the NRC of a change being made to Ginna Station's frequency for inspecting turbine low pressure rotors for disc cracking.

Our current licensed inspection interval is based on a deterministic method provided in Westinghouse Topical Report MSTG-1-P, "Criteria for Low Pressure Nuclear Turbine Disc Inspection", June 1981. This criteria was approved via an NRC Safety Evaluation Report dated August 28, 1981. RG&E committed to use of this criteria to determine inspection intervals in a letter dated September 16, 1981, and this commitment was reiterated in our resolution of SEP Topic III-4.B, "Turbine Missiles", dated February 19, 1982.

The deterministic criteria in the Westinghouse Topical Report are as follows:

- 1. New discs should be inspected at the first refueling outage, or before any postulated crack would grow more than $\frac{1}{2}$ the critical depth.
- 2. Discs previously inspected and found to be free of cracks or that have been repaired to eliminate all indications should be re-inspected using the same criterion as for the new discs, calculating the crack growth from the time of the last inspection.
- 3. Discs operating with known and measured cracks should be re-inspected before $\frac{1}{2}$ the time calculated for any crack to grow to $\frac{1}{2}$ the critical crack depth.
- 4. These inspection schedules may be varied to coincide with scheduled outages. Westinghouse recommendations in this regard should be followed.



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Because of the lack of data from rotor inspections at the time, Westinghouse recommended an additional constraint of inspecting the rotors every 60 months to its customers. RG&E to date has been utilizing the 60 month inspection interval. However, based on nineteen subsequent years of rotor inspections at Ginna Station, and numerous inspections of identical and similar turbine rotors in the industry, we have determined that the additional 60-month constraint is no longer necessary. We now plan to base our low pressure rotor inspections on the more rigorous application of the criteria in the original 8/28/81 NRC Safety Evaluation Report, tempered by conservative Engineering judgment as appropriate.

Our current inspection schedule will result in a duration of 78 months for the limiting disc rotor, well within the Westinghouse deterministic criteria.

Very truly yours,

oherd Or kuly Robert C. Mecredy

 xc: Mr. Guy S. Vissing (Mail Stop 8C2) Project Directorate I Division of Licensing Project Management Office of Nuclear Reactor Regulation U.S. Nuclear Regulatory Commission Washington, D.C. 20555

> Regional Administrator, Region I U.S. Nuclear Regulatory Commission 475 Allendale Road King of Prussia, PA 19406

U.S. NRC Ginna Senior Resident Inspector