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ROCHESTER GAS AND ELECTRIC CORPORATION • 89 EAST AVENUE, ROCHESTER, N.Y. 14649

LEON D. WHITE, JR. VICE PRESIDENT TELEPHONE AREA CODE 716 546-2700

November 3, 1978

Director of Nuclear Reactor Regulation ATTN: Mr. Dennis L. Ziemann, CheffGULATCRY DOCKET FILE COPY Operating Reactors Branch #2GULATCRY DOCKET FILE COPY U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Dear Mr. Ziemann:

Amendment 17 to Provisional Operating License No. DPR-18 issued on March 28, 1978 included containment leakage test requirements for certain containment penetrations. Due to an oversight no requirements were included for piping penetrations with expansion bellows even though there are penetrations of this type at R.E. Ginna. Testing of these penetrations has been regularly performed in the past and will continue to be tested as required by Appendix J to 10 CFR Part 50. A technical specification will be proposed at a convenient time to specifically include these requirements.

In a letter dated September 21, 1978 Rochester Gas and Electric committed to modify the piping of eight containment penetrations. The modifications are to provide the capability to drain fluid away from containment isolation valves and assure exposure of the valves to containment air test pressure during leakage testing of those systems which may be open to the containment atmosphere under post-accident conditions. However, leakage testing of the containment spray system isolation valves will continue to be performed with water on the valves in accordance with section III.C.2 of Appendix J to 10 CFR Part 50. This system is normally filled with water and will be operating under post-accident conditions. In addition seal water is provided by the residual heat removal system, which has a discharge head of 120 psig and is capable of maintaining the fluid pressure at the valves in excess of the containment pressure. A thirty day supply of water is assured by recycling containment sump water through the containment spray system piping back to the contain-Therefore leakage testing with an air medium is not ment. required for this system.

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Sincerely yours,

L. D. White, Jr.

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