



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

Enclosure 1

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
FOR PROPOSED TECHNICAL SPECIFICATION CHANGES FOR THE
MAIN STEAM SAFETY VALVES AND COMMENTS ON PROPOSED
TECHNICAL SPECIFICATIONS FOR THE AUXILIARY FEEDWATER PUMPS
AND ASSOCIATED FLOW PATHS
GINNA NUCLEAR POWER PLANT
DOCKET NO. 50-244

1.0 INTRODUCTION

A. Purpose

The licensee for the R. E. Ginna Nuclear Power Plant, the Rochester Gas and Electric Corporation (RGE), in a submittal dated May 9, 1989 proposed to change the Turbine Cycle Technical Specifications. The licensee's intention was to modify "...for clarity, and to incorporate changes to the Action Statements for the motor driven and turbine driven auxiliary feedwater pumps and associated flow paths, as well as a change to the testing requirements for the turbine driven auxiliary feedwater pump."

Based on its review of the proposed changes, the staff concludes that the licensee did not attain the goal of clarity. Further, the staff finds that the proposed TS changes do not provide sufficient assurance of required AFW system operability.

Therefore, the staff is providing in the accompanying evaluations below "model" technical specifications for the Ginna AFW system using the Standard Technical Specifications for Westinghouse Pressurized Water Reactors (NUREG-0452) as the basis, with some modifications made to account for differences between the Ginna AFW systems and more typical plant designs. The staff is also providing a critique of those Technical Specification changes proposed by the Ginna licensee, and suggests changes so as to bring them into conformance more closely with the STS. In addition, the staff is providing an evaluation of the changes proposed by the licensee to the Technical Specifications for the main steam safety valves (MSSVs). The staff finds the proposed MSSV Technical Specification changes to be acceptable.

B. Description of the Ginna AFW System

The Ginna Nuclear Plant has an AFW system with two subsystems, the main auxiliary feedwater (MAFW) system and the standby AFW system. The MAFW system consists of three pumps, two of which are motor driven while the third is driven by a steam turbine.

The primary water supply for the three AFW pumps comes from the condensate storage tanks (CSTs) by gravity feed. These tanks are required by Technical Specifications to maintain a minimum water supply of 22,500 gallons for the MAFW pumps. A backup supply of water is provided by the service water system which takes water from Lake Ontario in the event that the CST supply is not available.

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The MAFW system is normally separated into three trains, one for each motor driven pump, and one for the turbine driven pump. The motor driven pumps normally feed separate steam generators (A or B), but can be aligned to permit feeding either steam generator. The turbine driven AFW pump train normally feeds both steam generators. The motor driven pumps in the MAFW system start automatically if the level in one SG decreases to a low-low level of 17%. The steam turbine driven pump starts if the level in both SGs decreases to that level.

The standby AFW (SAFW) system is intended for use in the event a main steamline break outside containment causes the MAFW system to fail because it is not qualified to operate in the potentially harsh steam environment which can result from the steamline break. The SAFW system is a two-pump, two-train system which is separated from the MAFW system, and is started manually.

The water supply for the SAFW system is provided by the service water system. The SAFW system also contains a condensate supply tank with a capacity of 10,000 gallons which is normally used for testing the SAFW system pumps.

II. Model Technical Specifications for AFW Systems

A. Main Auxiliary Feedwater System

1. Objective

The following model Technical Specification is provided in order to define the operability requirements of the Ginna AFW system and the actions to be taken in order to maintain that operability, and thereby ensure the capability to remove decay heat from the core when required.

2. Limiting Condition for Operation

When the RCS temperature is at or above 350°F, the following conditions shall be met:

At least three independent main auxiliary feedwater pumps and associated flow paths shall be OPERABLE with:

- a. Two MAFW pumps, each capable of being powered from separate OPERABLE emergency busses, and
- b. One MAFW pump capable of being powered from an OPERABLE steam supply system.

The associated flow path includes the path of water from the condensate storage tanks to the steam generator. For the turbine driven pump only, an associated flow path includes the flow path of steam from the steam generator to the pump turbine.

3. Action Statement

- a. With one motor driven main auxiliary feedwater pump inoperable, restore the required auxiliary feedwater pumps to OPERABLE status within 7 days or be in at least HOT SHUTDOWN within the next 6 hours and have the Reactor Coolant System (RCS) below 350°F within the following 6 hours.
- b. With the turbine driven main auxiliary feedwater pump inoperable, restore the pump to OPERABLE status within 72 hours, or be in at least HOT SHUTDOWN within the next 6 hours and have the RCS below 350°F within the following 6 hours.
- c. With two or more main auxiliary feedwater pumps inoperable be in at least HOT SHUTDOWN within 6 hours and have the RCS below 350°F within the following 6 hours.

4. Surveillance Requirements

Each auxiliary feedwater pump shall be demonstrated OPERABLE:

- a. At least once per 31 days on a staggered basis by:

- (1) Verifying that each motor driven pump develops a discharge pressure of greater than or equal to ___ psig at a flow of greater than or equal to 200 gpm.
- (2) Verifying that the turbine driven pump develops a discharge pressure of greater than or equal to ___ psig at a flow of greater than or equal to 400 gpm when the secondary steam supply pressure is greater than ___ psig.

Upon entering the operating mode the operability of the turbine driven pump must be verified before exceeding a power level of 5%.

- (3) Verifying that each non-automatic valve in the flow path that is not locked, sealed, or otherwise secured in position, is in its correct position.
- b. The main AFW system shall be demonstrated operable at least once per 18 months during shutdown by:
 - (1) Verifying that each automatic valve in the main AFW flow path actuates to its correct position upon receipt of an auxiliary feedwater actuation test signal.
 - (2) Verifying that each pump starts automatically upon receipt of an auxiliary feedwater actuation test signal.

B. Standby Auxiliary Feedwater (SAFW) System

1. Objective

The following model Technical Specification is provided in order to define the operability requirements of the SAFW system and the actions to be taken in order to maintain that operability, and thereby ensure the capability to remove decay heat from the core for those events required.

2. Limiting Condition for Operation

When the RCS temperature is at or above 350°F, the following conditions shall be met.

At least two independent steam generator standby auxiliary feedwater pumps and associated flow paths shall be operable with two SAFW pumps, each capable of being powered from a separate operable emergency buss. The associated flow path includes the path of water from the service water system to the steam generator.

3. Action Statement

- a. With one standby auxiliary feedwater pump inoperable and at least two main auxiliary feedwater pumps operable, restore the required standby auxiliary feedwater pumps to OPERABLE status within 14 days or be in at least HOT SHUTDOWN within the next 6 hours and have the RCS below 350°F within the following 6 hours.
- b. With both standby auxiliary feedwater pumps inoperable and at least two main auxiliary feedwater pumps operable, restore at least one standby auxiliary feedwater pump to operable status within 7 days or be in at least HOT SHUTDOWN within 6 hours and have the RCS below 350°F within the following 6 hours. If only one AFW pump is operable, be in at least HOT SHUTDOWN within 6 hours and have the RCS below 350°F within the next 6 hours. If no AFW pump is operable, immediately initiate corrective action to restore at least one main auxiliary feedwater or standby auxiliary feedwater pump to OPERABLE status as soon as possible.

4. Surveillance Requirements

Each standby auxiliary feedwater pump shall be demonstrated OPERABLE:

- a. At least once per 31 days by:
 - (1) Verifying that each pump develops a discharge pressure of greater than or equal to ___ psig at a flow of greater than or equal to 200 gpm.
 - (2) Verifying that each valve not operable from the control room in the flow path that is not locked, sealed, or otherwise secured in position, is in its correct position.
- b. At least once per 18 months during shutdown by:

Verifying that the SAFWS pumps can be initiated from the control room.
- c. Water Supply for Main Auxiliary Feedwater and Standby Auxiliary Feedwater Systems

1. Objective

The following model Technical Specification is provided in order to ensure availability of an adequate source of water for the MAFW and SAFW systems.

2. Limiting Condition for Operation

- a. The condensate storage tanks (CST) shall be operable with a contained volume of at least 22,500 gallons whenever the RCS temperature is above 350°F.
- b. The service water system as the main supply to the SAFW pumps and as a backup supply for the MAFW pumps shall be operable whenever the RCS temperature is above 350°F.

3. Action Statement

- a. With the condensate storage tank inoperable, within 4 hours either:
 - (1) Restore the CST to OPERABLE status or be in at least HOT SHUTDOWN within the next 6 hours and have the RCS temperature below 350°F within the following 6 hours, or
 - (2) Demonstrate the OPERABILITY of the service water system as a backup supply to the main auxiliary feedwater pumps and restore the condensate storage tank to OPERABLE status within 7 days or be in at least HOT SHUTDOWN within the next 6 hours and have the RCS temperature below 350°F within the following 6 hours.
- b. With the service water system to a SAFW pump inoperable, declare the SAFW pump inoperable. Restore the service water supply to operable status within 14 days or be in hot shutdown within the next 6 hours and have the RCS temperature below 350°F within the following 6 hours.

4. Surveillance Requirements

- a. The condensate storage tank shall be demonstrated OPERABLE at least once per 12 hours by verifying the contained water volume is within its limits when the tank is the supply source for the main auxiliary feedwater pumps.
- b. The service water supply to the standby auxiliary feedwater and main auxiliary feedwater pumps shall be demonstrated operable at least once every 31 days."

III. Critique of Ginna Proposed Technical Specifications

The proposed Technical Specification for the Ginna auxiliary feedwater systems were reviewed and compared with the model Technical Specifications proposed by the staff, below. The Technical Specification numbers used here are the same as those in the licensee's listing and are utilized for ease of comparison. Changes are suggested so as to have the Technical Specifications here conform more closely with those in the STS. Note that the licensee has proposed to revise the Technical Specifications for the Ginna AFW system almost completely with the exception of Action Specification 3.4.3.a. We have inserted the word "main" in the licensee's specifications to differentiate between the total (AFW) system and its two subsystems in order to avoid confusion.

3.4.2 Main Auxiliary Feedwater

3.4.2.1 Main Motor driven Auxiliary Feedwater Supply

Specification

With the RCS temperature at or above 350°F, both main motor driven auxiliary feedwater pumps must be operable, each with an operable discharge flow path to its respective steam generator.

Action

- a. With one motor driven main auxiliary feedwater pump or discharge flow path inoperable, satisfy the requirements of 3.4.2.2.c. If the pump or flow path is not operable within 7 days, submit a Special Report within an additional 30 days in accordance with Specification 6.9.2 outlining the cause of inoperability and plans for restoring the pump or flow path to operable status.
- b. With both motor driven main auxiliary feedwater pumps or discharge flow paths inoperable, restore a pump and flow path to one steam generator to operable status within 72 hours or be in hot shutdown within the next 6 hours and at an RCS temperature less than 350°F within the following 6 hours.

The staff considers the "Specification" portion unacceptable because it concerns itself only with an AFW motor driven pump and its discharge path. The word "discharge" should be deleted thereby assuring an operable pump with a complete flow path, including the suction line. This change should also be made appropriately, in Action Statements 3.4.2.1 a and b.

The first part of Action Statement "a" requires that the operator satisfy the requirements of Action Statement 3.4.2.2.c with one motor driven AFW pump or discharge path inoperable. Action Statement 3.4.2.2.c requires that the turbine driven pump together with its discharge path to and steam admission path from the steam generator fed by the inoperable motor driven pump be operable, allowing 72 hours for any inoperability therein to be corrected before proceeding to hot shutdown. The acceptability of this statement is discussed in detail under Section 3.4.2.2.c, in sequence below.

The second portion of Action 3.4.2.1.a is not satisfactory. It permits a motor driven pump to be inoperable for a period as long as 37 days until the Commission is advised of the licensee's plans. This outage period continues while the NRC staff examines those plans for restoration of pump operability, and is extended while a response is prepared by the staff. This outage continues while the licensee perfects the plans and, finally, only ceases once the plans are put into action and the necessary corrections or modifications are made. Thus, the outage could continue for an extended period of time and, as guided by the specification, has no limitation. Furthermore, by requiring staff approval of any proposed plan for corrective action, the Commission is in the position of being responsible, at least partly, for the length of outage time during which the plant is operating with a degraded AFW system. For these reasons, Action Statement 3.4.2.1.a is unacceptable. The statement should be modified by deleting everything beyond "7 days" and adding the following- "be in HOT SHUTDOWN within 6 hours and at an RCS temperature less than 350°F within the following 6 hours."

Action Statement 3.4.2.1.b is unsatisfactory as is because, in contrast to the STS, it permits the two motor driven pumps to be inoperable for 72 hours before initiating shutdown. The licensee should adopt the STS position by requiring that shutdown be initiated upon inoperability of two AFW pumps. This may be done by deleting the words "restore a pump ...within 72 hours or..."

3.4.2.2 MAIN TURBINE DRIVEN AUXILIARY FEEDWATER SUPPLY

Specification

With the RCS temperature at or above 350°F the turbine driven auxiliary feedwater pump, both steam admission and both discharge flow paths must be operable. The steam turbine driven auxiliary feedwater pump must be shown to be operable prior to exceeding 5% power.

Action

- a. With one steam admission flow path or pump discharge flow path inoperable, restore to operable status within 7 days or submit a Special Report in accordance with Specification 6.9.2 outlining the cause for inoperability and plans for restoring to operable status.
- b. With the turbine driven auxiliary feedwater pump or both discharge flow paths or both steam admission flow paths inoperable, restore the inoperable pump and a discharge flow path and a steam supply associated with the same steam generator to operable status within 7 days or be in hot shutdown within the next 6 hours and at an RCS temperature less than 350°F in the following 6 hours.
- c. With one main motor driven auxiliary feedwater pump or discharge flow path inoperable, the turbine driven auxiliary feedwater pump, the steam admission flow path from, and discharge flow path to, the steam generator that is aligned with the inoperable motor driven pump shall be operable, or restore the turbine driven pump or flow path(s) associated with that steam generator to operable status within 72 hours or be in hot shutdown within the next 6 hours and at an RCS temperature less than 350°F in the following 6 hours.

In the specification section of 3.4.2.2, the entire flow path of water including the suction supply from the CSTS to the pump should be included in the overall path by changing the words "...both steam admission and both discharge flow paths..." to "both steam admission paths and both flow paths..." Similar changes should be made, as appropriate, in action statements 3.4.2.2 a, b and c.

Action statement "a" should be modified by deleting everything following "within 7 days" and replacing it by adding "...or be in hot shutdown within the next 6 hours and have the RCS at a temperature less than 350°F in the following 6 hours." The reasoning for this change is the same as that given for action statement 3.4.2.1.a, above.

Action Statement "b" should be revised to substitute an allowable repair time of 72 hours in lieu of 7 days consistent with the Standard Technical Specifications.

Action statement "c" should be deleted because it is confusing and unnecessary once the licensee corrects the technical specifications to conform with present standards as recommended in this discussion.

3.4.2.3 STANDBY AUXILIARY FEEDWATER SUPPLY

Specification

With the RCS temperature at or above 350°F, both standby auxiliary feedwater pumps and their associated discharge flow paths, including cross-connects, shall be operable.

Action

With one standby auxiliary feedwater pump or its discharge or crosstie flow path inoperable, restore the pump and flow path(s) to operable status within 7 days or be in hot shutdown within the next 6 hours and at an RCS temperature less than 350°F within the following 6 hours.

Here, again, the specification section should include the entire flow path (including suction side of the pumps). The inoperability time specified in the Action Statement should be extended to 14 days for one pump provided that at least two MAFW pumps are operable. This extension is allowable because the SAFW system is a backup to the MAFW system, and is required only in the event of a steam break outside containment which causes damage to all the nonenvironmentally qualified AFW pump trains. Under all other accidents and transients events, the MAFW system is the primary source of delivery of water to the steam generators for decay heat removal.

The operability of the crosstie for the SAFW system need not be included in the Technical Specifications since it is not depended upon for mitigation of transients or accidents.

The above action statement should be identified as action statement "a". The following should be added as action statement "b".

b. With both standby auxiliary feedwater pumps inoperable and at least two main auxiliary feedwater pumps operable, restore at least one pump to operable status within 7 days or be in at least HOT SHUTDOWN within 6 hours and have the RCS below 350°F within the following 6 hours. If only one MAFW pump is operable, be in at least HOT SHUTDOWN within 6 hours and have the RCS below 350°F within the next 6 hours. If no AFW pump is operable, immediately initiate corrective action to restore at least one auxiliary feedwater or standby auxiliary feedwater pump to OPERABLE status as soon as possible."

3.4.3 SOURCES OF AUXILIARY FEEDWATER

Specification

With the RCS temperature at or above 350°F, the following sources of auxiliary feedwater shall be operable:

- a. The condensate storage tanks with a minimum of 22,500 gallons of water and flow paths to the motor driven and turbine driven main auxiliary feedwater pumps, and
- b. Service water supply to the motor driven main and standby auxiliary feedwater pumps; and
- c. Service water supply to the turbine driven auxiliary feedwater pump if one motor driven main auxiliary feedwater pump or discharge flow path is inoperable.

Action

- a. With the required 22,500 gallons of water unavailable in the condensate storage tanks, within 4 hours either
 - 1) restore the required amount of water, or
 - 2) demonstrate the operability of the service water system as a backup water supply to the main auxiliary feedwater system and restore the required amount of water in the condensate storage tanks within 7 days, or
 - 3) be in hot shutdown within the following 6 hours and at an RCS temperature less than 350°F within the following 6 hours.
- b. With the service water system or service water flow path to any motor driven main or standby auxiliary feedwater pump inoperable, declare the affected pump inoperable.
- c. With the service water flow path to the turbine driven auxiliary feedwater pump inoperable, when one motor driven main auxiliary feedwater pump or discharge flow path is inoperable, declare the turbine driven pump inoperable.

The specification section of 3.4.3 should be modified by changing "b" to include the service water (SW) supply as the secondary (backup) water supply for the MAFW pumps and as the primary supply for the SAFW pumps. Specification "c" should be deleted since there need be no qualification as to when the SW supply should be available to the turbine driven AFW pump; it should be available at all times the CST supply is not available. This is also true for the motor driven MAFW pumps.

Action Statement "b". should be changed to the following: With the service water supply to any standby auxiliary feedwater pump inoperable, declare the pump inoperable and restore the service water supply to operable status within 14 days or be in hot shutdown within 6 hours thereafter and at an RCS temperature less than 350°F within the following 6 hours.

IV. Testing of AFW Pumps

The Technical Specifications proposed by the licensee for testing of the AFW pumps are contained in Ginna Specification 4.8. Note that the licensee proposes to change only the latter portion of Specification 4.8.2 to allow for testing of the turbine driven pump in the event one flow path is inoperable by establishment of a lower flow rate through that path.

4.8 AUXILIARY FEEDWATER SYSTEMS

Applicability

Applies to periodic testing requirements of the turbine driven and motor driven auxiliary feedwater pumps and of the standby auxiliary feedwater pumps.

Objective

To verify the operability of the auxiliary feedwater system and the standby auxiliary feedwater system and their ability to respond properly when required.

Specification

- 4.8.1 Except during cold or refueling shutdowns each motor driven auxiliary feedwater pump unless it is declared inoperable without testing will be started at intervals not to exceed one month and a flowrate of 200 gpm established.
- 4.8.2 Except during cold or refueling shutdowns the steam turbine driven auxiliary feedwater pump unless it is declared inoperable without testing will be started at intervals not to exceed one month and a flowrate of 400 gpm established. If one discharge flow is inoperable in accordance with Specification 3.4.2.2.a, a flow of 200 gpm must be established.
- 4.8.3 Except during cold or refueling shutdowns the auxiliary feedwater pumps suction discharge and crossover motor operated valves shall be exercised at intervals not to exceed one month.
- 4.8.4 Except during cold or refueling shutdowns each standby auxiliary feedwater pump unless it is declared inoperable without testing, will be started at intervals not to exceed one month and a flowrate of 200 gpm established.
- 4.8.5 Except during cold or refueling shutdowns, the suction, discharge, and cross-over motor operated valves for the standby auxiliary feedwater pumps shall be exercised at intervals not to exceed one month.

- 4.8.6 These tests shall be considered satisfactory if control board indication and subsequent visual observation of the equipment demonstrate that all components have operated properly. These tests shall be performed prior to exceeding 5% power during a startup if the time since the last test exceeds one month.
- 4.8.7 At least once per 18 months, control of the standby auxiliary feed system pumps and valves from the control room will be demonstrated.
- 4.8.8 At least once per 18 months during shutdown:
- a. Verify that each automatic valve in the flow path for each auxiliary feedwater pump actuates to its correct position upon receipt of each auxiliary feedwater actuation test signal.
 - b. Verify that each auxiliary feedwater pump starts as designed automatically upon receipt of each auxiliary feedwater actuation test signal.
- 4.8.9 Each instrument channel shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK, CHANNEL CALIBRATION, and CHANNEL FUNCTIONAL TEST operations for the MODES and at the frequencies shown in Table 4.1-1.
- 4.8.10 The RESPONSE TIME of each pump and valve required for the operation of each "train" of auxiliary feedwater shall be demonstrated to be within the limit of 10 minutes at least once per 18 months.

The wording in the second sentence of the licensee's proposed change to Specification 4.8.2 should be changed to read "If one discharge flow path is inoperable, a flow of 200 gpm must be established." An additional line should be added, as follows: "Once the inoperable discharge flow path is returned to operable status, a flow of 400 gpm must be established within 72 hours thereafter."

In so doing, the question of action to be taken is left, properly, within that portion of the overall specification where such statements belong, and the pump is tested at full flow once the system is able to accommodate it.

A note should also be added to specification 4.8 to indicate that pumps should be tested on a staggered basis in conformance with the Standard Technical Specification.

V. MAIN STEAM SAFETY VALVES

3.4.1 Main Steam Safety Valves

Specification

Except during testing of the main steam safety valves, with the RCS temperature at or above 350°F, a minimum turbine cycle code approved steam relieving capability of eight (8) main steam safety valves shall be available.

Action

With one or more main steam code safety valves inoperable, restore the inoperable valve(s) to operable status within 4 hours or be in hot shutdown within the next 6 hours and at an RCS temperature less than 350°F within the following 6 hours.

The licensee made no technical changes in this specification except to rearrange it so as to separate it from those for the AFW system. We find this acceptable because it is only an administrative change to a previously approved Technical Specification.

VI. CONCLUSIONS

The staff has provided model Technical Specifications for the Ginna AFW system using the STS as a guide as modified to account for the plant-specific differences over the "standard" plant AFW system. The staff has also reviewed the Technical Specifications proposed by the licensee and identified changes to them to bring them more closely in compliance with the current Standard Technical Specifications. These changes account for the fact that Ginna has two additional AFW pumps, those in the standby AFW system, specifically designed to provide feed-water to the steam generators in the event a steam line break outside of containment renders the "normal" AFW system inoperable because it is not environmentally qualified. Specific summary comments on the licensee's proposed Technical Specifications are:

- (1) In the narrative (Bases), the licensee dwells upon the use of the AFW turbine driven pump in mitigation of a Station Blackout (SBO) Event. It should be noted that SBO is a separate consideration. The AFW system Technical Specifications are intended to ensure operability of the system for all design basis accidents and transients and should conform to the recommendations of Item II.E.1.1 of NUREG-0737, "Clarification of TMI Action Plan Requirements." These guidelines do not include SBO. The licensee should modify the AFW system Technical Specification bases as appropriate when proper Technical Specifications are proposed.
- (2) The licensee's Technical Specifications contain Action Statements for an inoperable motor driven AFW pump and for one inoperable turbine driven flow path, to allow the pump or path to be inoperable for a period in excess of 5 weeks (37 days) without any limitation thereafter, except to say:

"If the pump or flow path is not operable within 7 days, submit a Special Report within an additional 30 days in accordance with Specification 6.9.2 outlining the cause of inoperability and plans for restoring the pump or flow path to operable status."

(For the turbine driven pump, the 30 days was omitted, apparently by accident since the previous specification included the 30 day limitation for all 3 AFW pumps).

The staff finds this to be unsatisfactory as indicated above.

Based on the above, the staff concludes that the licensee's proposed AFW system Technical Specifications are unacceptable for ensuring adequate system operability. The long outage times proposed by the licensee for some AFW components are inappropriate, considering the importance of the safety function performed by the AFW system in removing decay heat during transients and accidents. The licensee should, therefore, propose revised AFW system Technical Specifications consistent with the model Technical Specifications and comments which have been provided. The staff also concludes that the proposed main steam safety valve Technical Specification change is only administrative in nature and is acceptable.

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