UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

November 9, 1993

Docket No. 50-244

LICENSEE: Rochester Gas and Electric Corporation

FACILITY: Ginna Nuclear Power Plant

SUBJECT: SUMMARY OF MEETING WITH ROCHESTER GAS AND ELECTRIC CORPORATION ON OCTOBER 18, 1993 - REVISED STANDARD TECHNICAL SPECIFICATIONS FOR GINNA (TAC NO. M86818)

Rochester Gas and Electric Corporation (RG&E), as a lead utility in a Cooperative Efforts Group (CEG) for two-loop Westinghouse pressurized-water reactor, met with the NRC on October 18, 1993, to discuss a proposed approach for conversion and adoption of new improved Revised Standard Technical Specifications (RSTSs) for the Ginna plant. RG&E also discussed the potential for developing a generic two-loop RSTS for other CEG participants including, Wisconsin Electric Power Company (Point Beach 1 & 2), Wisconsin Public Services Corporation (Kewaunee), and Northern States Power Company (Prairie Island 1 & 2).

RG&E presented the CEGs reasons for considering RSTS conversion as: (1) the current plant custom Technical Specification (TS) issues are not user friendly, have limited information in the bases, and are unduly conservative, (2) numerous TS line-item improvements are now available (e.g., TOPS, NUREG-1431, GL 93-05, etc.), and (3) timeliness in processing license amendments due to the NRC priority determination system for staff review efforts.

RG&E presented to the NRC 10 questions regarding their approach for conversion and adoption of the RSTS for the CEG. The questions were addressed by the Office of Nuclear Reactor Regulation/Division of Operating Reactor Support/Technical Specifications Branch (NRR/OTSB) as follows:

1. NRR/OTSB indicated that the RG&E/CEG proposed RSTS approach appeared reasonable, and encouraged the CEG to pursue a cooperative effort.

2. The potential for NRR adding new requirements or changing the current TS requirements for the Ginna Station is unlikely because backfitting rules apply. NRR/OTSB encourages licensees to adopt new requirements to ensure completeness and consistency of the TSs.

3. Whether NRR can support RG&Es schedule, even considering the steam generator replacement in 1996, depends on all of the demands on NRR resources. License amendments are controlled by procedures for a priority ranking system for NRR reviews. Although the Commission policy statement on TS improvements provides that complete conversions would receive the highest priority, the particular review schedule also depends on how many conversion reviews are already underway.

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4. Question No. 4 did not exist.

5. NRR/OTSB recommended that the CEG refer to the STS for Combustion Engineering (NUREG-1432) for guidance on the differences in TSs for four-loop Westinghouse plant solid state protection system design and Ginna's two-loop plant with relay protection system design.

6. NRR/OTSB indicated that the extent to which only essential (operating and administrative) procedure changes are necessary to be accomplished at the time of TS conversion would be dependent on how well these procedures are established. NRR/OTSB further indicated that they would rely on the views of the Regional staff regarding the practicality of an alternate procedural control system.

7. NRR/OTSB indicated that it appears typical for licensees to begin training on the new technical specifications before they are approved to minimize the transition period for implementation. Nevertheless, such plans should be coordinated with the Regional staff responsible for monitoring the training program and operator licensing.

8. NRR/OTSB cannot accurately estimate NRC review costs having only completed one conversion review; however, the staff recommends 1-2 PSY and $50K for planning purposes (about $500K).

9. NRR/OTSB does not recommend RG&E change their inservice testing (IST) program at the time of a RSTS submittal in order to take immediate advantage of reduced surveillance requirements. The IST program for the Ginna Station should remain autonomous.

10. The "NRR Priority Determination for NRR Review Efforts" ranking procedures provide the general framework for review responsibilities for NRR. NRR/OTSB has the lead responsibility for TS conversion reviews with support from the other NRR branches as needed.

Enclosure 1 is a list of meeting attendees and Enclosure 2 is a copy of the meeting agenda and discussion material.

original signed by
Allen R. Johnson, Project Manager
Project Directorate I-3
Division of Reactor Projects - I/II

Enclosures:
1. List of Attendees
2. Meeting agenda and discussion material

cc w/enclosures:
See next page
*See previous concurrence

| OFFICE | LA:PDI-3 | PM:PDI-3 | *OTSB | D:PDI-3 | |
|---|---|---|---|---|---|
| NAME | SLittle | AJohnson:mw | CGrimes | WButler | |
| DATE | 11/8/93 | 11/9/93 | 11/05/93 | 11/9/93 | / / |

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Allen R. Johnson, Project Manager
Project Directorate I-3
Division of Reactor Projects - I/II

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cc w/enclosures:
See next page

R.E. Ginna Nuclear Power Plant

cc:

Thomas A. Moslak, Senior Resident Inspector
R.E. Ginna Plant
U.S. Nuclear Regulatory Commission
1503 Lake Road
Ontario, New York 14519

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

Ms. Donna Ross
Division of Policy Analysis & Planning
New York State Energy Office
Agency Building 2
Empire State Plaza
Albany, New York 12223

Charlie Donaldson, Esq.
Assistant Attorney General
New York Department of Law
120 Broadway
New York, New York 10271

Nicholas S. Reynolds
Winston & Strawn
1400 L St. N.W.
Washington, DC 20005-3502

Ms. Thelma Wideman
Director, Wayne County Emergency
Management Office
Wayne County Emergency Operations Center
7370 Route 31
Lyons, New York 14489

Ms. Mary Louise Meisenzahl
Administrator, Monroe County
Office of Emergency Preparedness
111 West Fall Road, Room 11
Rochester, New York 14620

Dr. Robert C. Mecredy
Vice President, Nuclear Production
Rochester Gas and Electric Corporation
89 East Avenue
Rochester, New York 14649

List of Attendees

NRC AND COOPERATIVE EFFORTS GROUP IMPROVED

STANDARD TECHNICAL SPECIFICATIONS

R. E. GINNA NUCLEAR POWER PLANT

OCTOBER 18, 1993

| Name | Title |
|---|---|
| Allen R. Johnson | USNRC/NRR/PDI-3 |
| Ronnie Lo | NRR/OTSB |
| L. B. Marsh | NRR/DRPW |
| C. I. Grimes | NRR/OTSB |
| Gary Krieser | WIS Electric |
| Roger O. Anderson | Northern States Power |
| Allen Hansen | NRC/NRR/DRPW |
| Richard Laufer | NRC/NRR/DRPW |
| Richard Pulec | Wisc. Public Service |
| Dean Tilly | NSP/Monticello |
| K. R. Cotton | NRR/PDI-3 |
| W. R. Butler | NRR/PDI-3 |
| C. W. Suggs | Westinghouse |
| Marsha Gamberoni | NRR/DRPW |
| Tom Lordi | Westinghouse |
| Randy Whetsel | NUS |
| Calvin W. Moon | NRR/OTSB |
| Robert C. Mecredy | VP, Ginna Nuclear Production |
| Mark Flaherty | RG&E, Licensing |

# ROCHESTER GAS & ELECTRIC CORPORATION
# R.E. GINNA NUCLEAR POWER PLANT

# POTENTIAL LIMITED CONVERSION TO REVISED STANDARD TECHNICAL SPECIFICATIONS (NUREG-1431)

Meeting With NRC Technical Specification Branch
One White Flint North
Rockville, MD

October 18, 1993

# AGENDA

I. Introduction - R. Mecredy

- Attendees
- Purpose of Meeting

II. Conversion Approach Under Consideration - G. Wrobel

- Background
- Proposed Approach
- Cost Benefit Study
- Questions for NRC

III. Potential For Two-Loop Cooperative Effort - M. Flaherty

IV. Summary - R. Mecredy

# ATTENDEES FROM WESTINGHOUSE TWO-LOOP UTILITIES

| NAME | TITLE | COMPANY |
|---|---|---|
| Robert Mecredy | VP, Ginna Nuclear Production | RG&E |
| George Wrobel | Manager, Nuclear Safety & Licensing | RG&E |
| Mark Flaherty | Nuclear Safety & Licensing Engineer | RG&E |
| Roger Anderson | Director, Licensing & Mgmt Issues | NSP |
| Gary Krieser | Manager, Regulatory & Industry Affairs | WEP |
| Rick Pulec | Superintendent, Licensing and Systems | WPS |

# PURPOSE OF MEETING

I. Present Proposed Approach For Conversion To Revised Standard Technical Specifications (RSTS) For Ginna Station

II. Obtain NRC Feedback For Cost Benefit Study

- Verbal
- Written

III. Discuss Potential For Two-Loop Plant Cooperative Effort

# BACKGROUND

I. Reasons For Considering RSTS Conversion:

- Custom TS "Issues":
  - format and structure (not user friendly)
  - limited bases information
  - conservative
- Numerous Line-Item Improvements Available (e.g., TOPS, NUREG-1431, GL 93-05)
- Difficulty in Obtaining TS Changes

II. Concerns:

- Cost
- Increased Requirements

# PROPOSED APPROACH

I. Generate "Split Report" Consistent With TS Policy Statement

II. Implement Numerous Line-Item Improvements

III. Convert Remaining Items To RSTS Format

IV. Add Limited New Surveillance Tests and Action Statements. In General:

- No new requirements will be added
- Current requirements "inconsistent" with NUREG-1431 will not be changed

# EXAMPLES OF DIFFERENCES WITH NUREG-1431

I. No Current Ginna Specification:

- Containment Temperature
- RCP Seal Injection Flow
- Main Feedwater Isolation and Regulation Valves
- S/G Atmospheric Dump Valves
- ECCS Requirements Below 350°F
- Hydrogen Recombiners
- Remote Shutdown System
- Ultimate Heat Sink

II. Differences With NUREG-1431:

- Only One Pressurizer Heater Currently Required (Versus Two)
- Current AOT for One D/G is 7 Days (Versus 3 Days)
- Can Operate Indefinitely With One Offsite Source Unavailable Provided Both D/Gs Available (Versus 3 Day Limit)

# COST BENEFIT STUDY

I. Conversion Must Be Cost Justified

II. Anticipated Costs:

- Internal Resources For Conversion
- Impact on Training
- Procedure Changes
- NRC Review Fees

III. Anticipated Benefits:

- "Hard" Dollars
  - Reduced Surveillance Testing
- "Soft" Dollars
  - Less Restrictive Requirements ("Insurance")
  - More Efficient Processes (e.g., 50.59s, Operator Training and Response to Circumstances)

# QUESTIONS FOR NRC

1. Is proposed approach acceptable?

2. What is the potential for the NRC adding new requirements or changing the current requirements for Ginna Station?

3. The following is the most cost effective schedule for implementing the proposed approach. This is due to the S/G Replacement scheduled for 1996, conversion to 18 month cycles and optimized use of the training program. Can the NRC support this schedule?

| Item | Date |
|---|---|
| Make Final Decision To Proceed | 12/93 |
| Initiate Program | 1/94 |
| Provide NRC and Training With Proposed TS | 1/95 |
| Obtain NRC Approval | 1/96 |
| Implement New TS | 6/96 |

# QUESTIONS FOR NRC (Continued)

5. NUREG-1431 was written for a 4-Loop Westinghouse plant with a solid-state protection system design versus a 2-Loop plant with a relay protection system design. What impact would this have on the NRC review? How would these type of discrepancies be resolved?

6. Changing procedures is a significant internal cost. RG&E would like to only change "essential" procedures (e.g., Operating and Administrative) at the time of conversion and change the remaining procedures during their periodic review. A cross-reference between the current and converted TS would be provided at the beginning of the converted TS document until all procedures were updated. Does the NRC have any concerns with this approach? What type of enforcement action would be expected for TS procedural violations in the short-term following implementation?

# QUESTIONS FOR NRC (Continued)

7. RG&E would like to begin training Operations staff on the converted TS prior to NRC approval (mainly new licensed operator classes). This is the most efficient use of internal resources and allows for potential problems to be resolved prior to final NRC approval. Does the NRC has any problems with this approach?

8. RG&E estimates an NRC review cost of approximately $250K. Is this a reasonable estimate? If so, this is the highest individual cost for conversion and not under RG&E control.

9. The TS Policy Statement explains that requirements reallocated from TS "may be changed or deleted in conjunction with the filing of individual TSs". Can RG&E change the IST Program for Ginna Station at the time of the submittal in order to take immediate advantage of reduced surveillance requirements (e.g., monthly to quarterly pump testing)?

# QUESTIONS FOR NRC (Continued)

10. What NRC branches will review our submittal? If other than TS Branch, RG&E would like their concurrence prior to proceeding.

# POTENTIAL FOR TWO-LOOP COOPERATIVE EFFORT

I. Purpose of Two-Loop Cooperative Efforts Group

- Formed in September of 1992 by RG&E, NSP, WEP, and WPS to share resources to reduce operating, maintenance, and capital expenditures.

II. Potential For Cooperative Effort

- Implement above approach for Two-Loop Plants
  - Develop generic Two-Loop submittal
  - Select one lead plant for detailed review
- Each plant must cost justify the conversion. Ginna currently has the most incentive since other plants have already implemented several of the available line-item improvements.
- Would a combined effort change NRC responses to any of the above questions?

# SUMMARY

I. Written Response to Questions and Documentation of Meeting Minutes

II. RG&E (and Two-Loop Plants) Must Complete Cost Benefit Study Before Preceding

III. RG&E Expects to Make Decision In December

DISTRIBUTION: (Enclosure 2*)
Docket File*
NRC & Local PDRs*
PDI-3 Reading*
T. Murley/F. Miraglia
J. Partlow
S. Varga
J. Calvo
W. Butler
A. Johnson*
S. Little
OGC
E. Jordan
R. Lo
L. B. Marsh
C. Grimes
A. Hansen
R. Laufer
K. Cotton
M. Gamgeroni
C. Moon
A. Chaffee
M. Boyle
E. Rossi
ACRS (10)
V. McCree, EDO
J. Linville,RI*