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 MECREDY,R.C.   Rochester Gas & Electric Corp.
  RECIP.NAME   RECIPIENT AFFILIATION
 JOHNSON,A.R.

SUBJECT: Submits addl info re environ qulification of neutron flux
         instrumentation.

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ROBERT C. MECREDY
Vice President
Nuclear Operations

September 20, 1995

U.S. Nuclear Regulatory Commission
Document Control Desk
Attn: Allen R. Johnson
       Project Directorate I-1
Washington, D.C. 20555

Subject: Supplemental   Submittal   Regarding   Neutron   Flux
          Instrumentation (TAC No. M90036)
          R.E. Ginna Nuclear Power Plant
          Docket No. 50-244

Ref.(a): Letter from Robert C. Mecredy, RG&E, to Allen R. Johnson,
          NRC, "Use of Neutron Flux Instrumentation During Post-
          Accident Severe Accident Conditions," February 3, 1995

Dear Mr. Johnson:

As a result of NRC staff review of information submitted in
Reference (a), a conference call was held between Rochester Gas and
Electric and NRC staff on June 30, 1995. During that call, the NRC
staff discussed additional information needed to conclude that
environmental qualification of neutron flux instrumentation is not
necessary. Accordingly, we are providing the following information
which we believe satisfies the remaining staff concern regarding
this issue:

Concern: Ensure that, in the event of an accident resulting in a
harsh containment environment (for which source range neutron flux
is not environmentally qualified), boration, as required to
mitigate the accident, is being delivered to the core.

Response: RG&E agrees that boric acid injection is required in such
circumstances.   Our plant design provides for the automatic
initiation of the engineered safety features (including boric acid
addition via the safety injection pumps) upon receipt of an adverse
containment signal of 4 psig. A review of our Emergency Operating
Procedures (EOP's) indicates that actions are presently specified
to direct the operator to restore safety injection ·if initiation is
not obtained.   For postulated accidents where the RCS is not
depressurized below the shutoff head of the safety injection pumps,
the operator is directed to align boric acid injection using the
charging pumps.

We believe that our current arrangement of EOPs and Critical Safety
Function Status Trees, allowing for optimal recovery procedures to

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be exercised prior to reliance on Functional Restoration Procedures (FRs), combined with timely use of appropriate FRs as needed, provides the actions needed to address the NRC's concern.

Even though we believe that the current procedures acceptably address the NRC's concern, we are emphasizing this issue, including a caution to the operators to not rely on neutron flux during a harsh environment condition, in our latest operator requalification training cycle session, which began on August 8, 1995.

Very truly yours,

Robert C. Mecredy

GJW\388
Attachment

xc: Mr. Allen R. Johnson (Mail Stop 14B2)
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    Washington, D.C. 20555

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    475 Allendale Road
    King of Prussia, PA 19406

    Ginna Senior Resident Inspector