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FACIL:50-244 Robert Emmet Ginna Nuclear Plant, Unit 1, Rochester G 05000244
AUTH.NAME AUTHOR AFFILIATION
MECREDY,R.C. Rochester Gas & Electric Corp.
RECIP.NAME RECIPIENT AFFILIATION
JOHNSON,A.R.

SUBJECT: Proposes amend to improved STSs re maint of containment function during fuel movement inside containment,per 951117 meeting.License amend application will be submitted by 960110.

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ROBERT C. MECREDY
Vice President
Nuclear Operations

December 4, 1995

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

Subject: Conversion to Improved Standard Technical Specifications
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Johnson:

In our meeting of November 17, 1995 concerning the conversion to the Improved Standard Technical Specifications for Ginna Station, the question of maintaining containment function during fuel movement inside containment was discussed. As a result of your decision to disallow our proposed option to relocate these containment requirements during fuel movement outside of the technical specifications (since no credit is taken for containment in the accident analysis), we are proposing an alternative option. This alternative is to pursue the option described below as an Amendment to the Improved Technical Specifications after they are approved.

RG&E will define containment function, as related to mitigation of a fuel handling accident, as follows:

CONTAINMENT FUNCTION:

Capability of containment to maintain radiological consequences well within (i.e. < 75 rem thyroid) Part 100, assuming:

- RG 1.25 analysis methodology;
- conservatively calculated containment penetration closure times; and
- conservatively calculated containment leak rates, once closed.

The details of the conservative calculations remain to be discussed.

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We plan to submit this license amendment application by January 10, 1996. It is needed to be approved, and effective, by April 1, 1996, so that it can be used during our Steam Generator replacement outage. It is estimated that this amendment, if not approved, will extend the duration of the outage by three full days.

Very truly yours,

Robert C. Mecredy

GJW\410

xc: Mr. Allen R. Johnson (Mail Stop 14B2)
Project Directorate I-1
Washington, D.C. 20555

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Ginna Senior Resident Inspector