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

SUBJECT: Forwards LAR revising TS to incorporate methodology for  
 determining LTOP limits in Administrative Controls Section  
 5.6.6.

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ROBERT C. MECREDDY  
Vice President  
Nuclear Operations

February 9, 1996

U.S. Nuclear Regulatory Commission  
Document Control Desk  
Attn: Allen R. Johnson  
Project Directorate I-3  
Washington, D.C. 20555

Subject: Application for Amendment to Facility Operating License  
Methodology for Low Temperature Overpressure Protection (LTOP) Limits  
Rochester Gas & Electric Corporation  
R.E. Ginna Nuclear Power Plant  
Docket No. 50-244

- References:
- (a) NUREG-1431, *Standard Technical Specifications, Westinghouse Plants*, April 1995.
  - (b) Letter from R.C. Mecreddy, RG&E, to A.A. Johnson, NRC, Subject: *Technical Specification Improvement Program, Reactor Coolant System (RCS) Pressure and Temperature Limits Report (PTLR)*, dated December 8, 1995.
  - (c) Letter from L.T. Marsh, NRC, to R.C. Mecreddy, RG&E, Subject: *R.E. Ginna - Acceptance for Referencing of Pressure Temperature Limits Report (TAC # M92320)*, dated December 26, 1995.

Dear Mr. Johnson,

The enclosed License Amendment Request (LAR) proposes to revise the Ginna Station Technical Specifications to incorporate the methodology for determining the LTOP limits into Administrative Controls Section 5.6.6. This change will allow RG&E to perform future LTOP evaluations using NRC approved methodology without requiring a potential technical specification change. The change will also provide consistency with NUREG-1431 (Ref. (a)).

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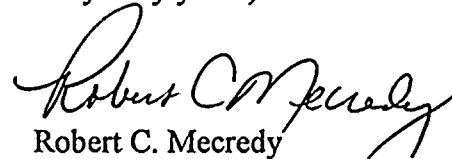
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The actual methodology being proposed by RG&E for determining LTOP limits was previously submitted to the NRC during the conversion to improved standard technical specifications for Ginna Station (Ref. (b), Attachment II). By Reference (c), the NRC stated that the staff could not complete its review of the methodology for the LTOP and RCS pressure and temperature limits provided in the PTLR since "RG&E had determined that they need to operate in accordance with the existing limits, previously approved by the staff." Therefore, the NRC allowed RG&E to relocate the actual limits to the PTLR but any changes to these limits would require NRC review and approval.

However, the determination that Ginna Station needed to "operate in accordance with existing limits" was with respect to the RCS pressure and temperature limits that are included in the PTLR, not for the LTOP limits. As such, this LAR requests that the LTOP methodology be reviewed and approved by the NRC staff such that it can be referenced within the Administrative Controls section of the technical specifications. Any changes to the RCS pressure and temperature limits included in the PTLR will still require NRC review and approval following this change.

Very truly yours,

  
Robert C. Mecredy

MDF\802  
Attachments

xc: U.S. Nuclear Regulatory Commission  
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