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MERCREDY,R.C. Rochester Gas & Electric Corp.
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VISSING,G.S.

SUBJECT: Forwards update to correction of typographical errors request for application for amend to DPR-18.

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ROBERT C. MECREDY
Vice President
Nuclear Operations

June 3, 1996

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

Subject: Application for Amendment to Facility Operating License
Update to Correction of Typographical Errors Request
Rochester Gas & Electric Corporation
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

References:
(a) Letter from R.C. Mecredy, RG&E, to G.S. Vissing, NRC, Subject: *Application for Amendment to Facility Operating License, Correction of Typographical Errors,* dated May 8, 1996.

(b) Letter from R.C. Mecredy, RG&E, to G.S. Vissing, NRC, Subject: *Application for Amendment to Facility Operating License, Correction of Typographical Errors, Request for Exigent Consideration,* dated May 10, 1996.

(c) Letter from R.C. Mecredy, RG&E, to G.S. Vissing, NRC, Subject: *Application for Amendment to Facility Operating License, Update to Correction of Typographical Errors,* dated May 29, 1996.

Dear Mr. Vissing,

By Reference (a), RG&E submitted a license amendment request (LAR) to correct several typographical errors within the Ginna Station Improved Technical Specifications (ITS). Subsequently, RG&E requested that this LAR be considered on an exigent basis due to the potential to delay a planned startup (Reference (b)). However, the NRC Staff has requested additional information as to why the LAR should be considered on an exigent basis. This information is provided below.

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The majority of changes documented in Attachment A to Reference (a) (and as updated in Reference (c)), are minor editorial corrections which are readily apparent to operators if they were in the applicable LCO. That is, these errors would not be expected to cause significant operator confusion but are errors which must be corrected. However, changes 3.ii.b and 3.ii.c as documented in Attachment A, Section B are more serious. These two changes relate to the equations for Overtemperature ΔT and Overpower ΔT and are discussed in detail below.

Change 3.ii.b corrects an inequality sign with respect to defining $f(\Delta I)$ for both the Overtemperature ΔT and Overpower ΔT equations. This is significant since the value used for $f(\Delta I)$ in both equations is treated as a penalty (i.e., depending on the degree of power tilt within the core, $f(\Delta I)$ may be either "0" or some value by which the Overtemperature ΔT and Overpower ΔT setpoints must be reduced to ensure that the plant remains bounded by the accident analysis). Without this correction, the equations have no specified value which should be used for $f(\Delta I)$ when the difference in power between the top and bottom halves of the reactor core is $\leq$ 13% RTP. Meanwhile, there are two different values which are to be used when the power difference between the top and bottom halves of the reactor core is > 13% RTP. This conflict would be confusing to operators and creates two equations in which a specific input is not defined for one instance and is defined twice in another instance.

Change 3.ii.c adds units to the equations for Overtemperature ΔT and Overpower ΔT and corrects an error in the Overpower ΔT equation with respect to constant K_5. The correction of constant K_5 is significant since the current Overpower ΔT equation essentially has no defined value to be used for this constant. This is due to the fact that K_5 is supposed to have two values, one for when measured RCS average temperature is less than nominal T_{avg} and one for when measured RCS average temperature is $\geq$ nominal T_{avg}. In the current technical specifications, values for when K_5 is less than "$T^{2"}$ and when K_5 is $\geq$ than "T^2 are specified. However, "$T^{2"}$ is not defined anywhere in the current specifications since it is a typographical error which should be "T'." Again, this would be confusing to operators and creates an equation in which a specific input is not defined.

Both the Overtemperature ΔT and Overpower ΔT equations are required to be used during MODES 1 and 2 per LCO 3.3.1. The proposed corrections makes both the Overtemperature ΔT and Overpower ΔT equations consistent with those equations used prior to implementation of the ITS. Failure to approve this LAR prior to entry into MODE 2 following the current refueling outage would prevent a planned startup due to editorial and typographical errors only since it would not be possible to operate with the technical specifications for these equations. Therefore, RG&E contends that the LAR meets the criteria for exigent consideration per 10 CFR 50.91.

In addition, RG&E has noticed an error in the revised Attachment II and III submitted by Reference (c). This error is the removal of "RTP" from the end of the two lines which define f(ΔI) in the Overtemperature ΔT and Overpower ΔT equations. The current equations have this "RTP" and it was RG&E's intent to retain this text. The "RTP" was inadvertently removed following a conference call with the NRC on May 28, 1996 and not added back in following a conference call on May 29, 1996. As such, please find attached copies of the properly revised Attachments II and III. No other pages of Reference (c) are affected.

Very truly yours,

Robert C. Mecredy

Subscribed and sworn to before me
on this 3rd day of June 1996.

JOANNE S. GORMAN
Notary Public in the State of New York
Orleans County
Commission Expires Nov. 19 96

Joanne S. Gorman
Notary Public

MDF\857
Attachments

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