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VISSING,G.S.
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SUBJECT: Requests that util 961231 limit for Rev 1 to plant RCS pressure & temperature limits & low temperature overpressure protection limits be extended until 970701.

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ROBERT C. MECREDY
Vice President
Nuclear Operations

December 2, 1996

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

Subject: Reactor Coolant System (RCS) Pressure and Temperature Limits Report (PTLR)
Rochester Gas & Electric Corporation
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

References: (a) Letter from G.S. Vissing, NRC, to R.C. Mecredy, RG&E, *Issuance of Amendment No. 64 to Facility Operating License No. DPR-18, R.E. Ginna Nuclear Power Plant*, dated May 23, 1996.

(b) WCAP-14040-NP-A, *Methodology Used to Develop Cold Overpressure Mitigating System Setpoints and RCS Heatup and Cooldown Limit Curves*, January 1996.

(c) Letter from R.C. Mecredy, RG&E, to G.S. Vissing, NRC, Subject: *Application for Amendment to Facility Operating License, Revision to Reactor Coolant System (RCS) Pressure and Temperature Limits Report (PTLR)*, dated September 13, 1996.

Dear Mr. Vissing,

By Reference (a), the NRC approved changes to Administrative Controls Section 5.6.6 of the Ginna Station Technical Specifications which allowed referencing of Revision 1 of the Ginna Station PTLR for the RCS pressure and temperature (P/T) limits and low temperature overpressure protection limits (LTOP). However, the cover letter which forwarded Amendment No. 64 stated that "this amendment is only for operation up to the end of the year 1996 after which the operation will be subject to staff approval of Revision 1 of the Pressure Temperature Limits Report (PTLR)" even though the P/T curves were valid until 22 effective full power years (EFPYs) which is not expected until the end of 1998. This stipulation was provided since the fluence factors used to generate the values provided in PTLR Revision 1 were estimated and not based on the methodology required by Reference (b). As such, the NRC requested that RG&E submit a revised PTLR using the required fluence factor methodology at least 90 days prior to December 31, 1996 to provide the NRC sufficient time for review.

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RG&E submitted the requested new PTLR on September 13, 1996 which provided the NRC with the requested 90 day review period (Ref. (c)). Several conference calls have been conducted between RG&E and the NRC concerning this submittal. The PTLR is essentially organized into three separate categories: (1) P/T curves, (2) LTOP setpoints, and (3) reactor vessel material surveillance program. It is RG&E's understanding that the NRC's review of the P/T curves and reactor vessel material surveillance program categories is essentially complete. This includes the new fluence factor values being proposed by RG&E that was the original basis for the December 31, 1996 limit with respect to Revision 1 of the PTLR.

However, during a conference call on November 26, 1996, questions were raised with respect to the proposed LTOP enable temperature and the boltup temperature. These questions are unrelated to the fluence factor values and are concerned with whether RG&E has taken into account instrument uncertainties for the values specified in the PTLR. The need for instrument uncertainties is based on the methodology statement that these values shall be based on the "water temperature corresponding to a metal temperature of ..." As discussed in that conference call, if RG&E were to account for these uncertainties, it would create significant operational burdens due to the close proximity of the LTOP enable temperature to the definition of Mode 3 (i.e., 350°F). The only method of resolving this concern is for RG&E to request use of an alternative means of determining the LTOP enable temperature (i.e., using ASME Code Case N-514) as allowed by Reference (b) and 10 CFR 50.55(a)(3). This is expected to take several weeks for RG&E to prepare and must still be approved by the NRC.

As such, RG&E requests that the December 31, 1996 limit for Revision 1 of the PTLR be extended until July 1, 1997. This request is based on the following:

a. RG&E has met all schedule related commitments for submitting a revised PTLR.

b. The December 31, 1996 limit was an arbitrary date that was mutually acceptable both to the NRC and RG&E when Amendment No. 64 was issued. There was no technical reason for selecting this date since the fluence factor values used by RG&E were an engineering based conservative estimate based on previous Westinghouse experience in this area. As a result of further analysis, it was determined that these fluence factors were within 3% of each other. Instead, the date was chosen to ensure that a rapid closure on this issue would be obtained so that RG&E could place the PTLR under licensee control as originally intended.

c. The existing P/T curves are valid until 22 effective full power years (EFPY) which is not expected to be reached at Ginna Station until late 1998. Therefore, an additional six month extension would not affect operation or the P/T curves.

d. RG&E will submit a request to allow use of ASME Code Case N-514 prior to December 31, 1996 in order to resolve the instrument uncertainty issue. RG&E will also submit a revised PTLR by that date incorporating all NRC comments received to date. Therefore, RG&E will still meet the intent of the December 31, 1996 limit by providing the NRC with all necessary information such that the extension is mainly being requested to provide the NRC with sufficient time for review of all material.

We request that the NRC provide acceptance of this request by December 15, 1996 to allow RG&E time to revise necessary plant documentation prior to the December 31, 1996 limit for Revision 1 of the PTLR. Please contact George Wrobel, Manager of Nuclear Safety and Licensing at (716) 724-8070 if you have further questions.

Very truly yours,

Robert C. Mecredy

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