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ROCHESTER GAS AND ELECTRIC CORPORATION • 89 EAST AVENUE, ROCHESTER, N.Y. 14649-0001

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March 30, 1988

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Secretary, U.S. Nuclear Regulatory Commission
Washington, DC 20555
Attention: Docketing and Service Branch

Subject: Alternative Method for Leakage Rate Testing
Federal Register Vol. 53 No. 39
Monday, February 29, 1988
Proposed Rules Page 5985

Dear Mr. Secretary:

The following is presented in response to your request for comments in the subject article of the Federal Register.

It is the view of the technical staff in our utility that the mass point method of evaluating test data provides an important and improved tool for use in conducting leakage rate testing of the Ginna containment.

It is also our view, however, that linking the mass point method with the 24 hour test duration requirement is inappropriate. In our view, the 24 hour requirement is unnecessarily restrictive in that leakage rate can generally be established with proper confidence in a shorter period of time. In lieu of the length of test requirement we suggest that the rulemaking should simply establish the acceptability of the mass point method and allow the analysis of data to determine the length of testing.

Very truly yours,

Bruce A. Snow
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