

ATTACHMENT A

Revise the Technical Specification pages as follows:

Remove

Page 6.2-1
Page 6.5-3
Page 6.5-4a
Page 6.5-10
Page 6.5-11
Page 6.6-1
Page 6.7-1

Insert

Page 6.2-1
Page 6.5-3
Page 6.5-4a
Page 6.5-10
Page 6.5-11
Page 6.6-1
Page 6.7-1

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Onsite and Offsite Organization

An onsite and an offsite organization shall be established for unit operation and corporate management. The onsite and offsite organization shall include the positions for activities affecting the safety of the nuclear power plant.

a. Lines of authority, responsibility and communication shall be established and defined from the highest management levels through intermediate levels to and including all Plant management positions. Those relationships shall be documented and updated, as appropriate, in the form of organization charts. These organization charts will be documented in the UFSAR and updated in accordance with 10CFR50.71.

b. The Senior Vice President, Production and Engineering, shall have corporate responsibility for overall Plant nuclear safety, and shall take any measures needed to assure acceptable performance of the staff in operating, maintaining, and providing technical support in the Plant so that continued nuclear safety is assured.

c. The Plant Manager, Ginna Station shall have responsibility for overall unit operation and shall have control over those resources necessary for safe operation and maintenance of the Plant.

RESPONSIBILITIES

6.5.1.6 The PORC shall be responsible for:

- a. Review of 1) all procedures required by Specification 6.8 and changes thereto, 2) any other proposed procedures or changes thereto as determined by the Plant Manager, Ginna Station to affect nuclear safety.
- b. Review of all proposed tests and experiments that affect nuclear safety.
- c. Review of all proposed changes to the Technical Specifications.
- d. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.
- e. Investigation of all violations of the Technical Specifications and shall prepare and forward a report covering evaluation and recommendations to prevent recurrence to the Senior Vice President, Production and Engineering, and to the Chairman of the Nuclear Safety Audit and Review Board.
- f. Review of facility operations to detect potential safety hazards.
- g. Performance of special reviews and investigations and reports thereon as requested by the Chairman of the Nuclear Safety Audit and Review Board.

- c. Provide immediate written notification to the Senior Vice President, Production and Engineering, and the Nuclear Safety Audit and Review Board of disagreement between the PORC and the Plant Manager, Ginna Station; however, the Plant Manager, Ginna Station shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above.

RECORDS

- 6.5.1.8 The PORC shall maintain written minutes of each meeting and copies shall be provided to the Senior Vice President, Production and Engineering, the Chairman of the Nuclear Safety Audit and Review Board, and such others as the Chairman may designate.

AUDITS (Continued)

- g. The Facility Fire Protection Program and implementing procedures at least once per two years.
- h. An independent fire protection and loss prevention program inspection and audit performed at least once per 12 months utilizing either qualified offsite licensee personnel or an outside fire protection firm.
- i. An inspection and audit of the fire protection and loss prevention program performed by non-licensee personnel at least once per 36 months. The personnel may be representatives of ANI, an insurance brokerage firm, or other qualified individuals.
- j. The radiological environmental monitoring program and the results thereof at least once per 12 months.
- k. The Offsite Dose Calculation Manual and implementing procedures at least once per 24 months.
- l. The Process Control Program and implementing procedures at least once per 24 months.
- m. Any other area of facility operation considered appropriate by the NSARB or the Senior Vice President, Production and Engineering.

AUTHORITY

- 6.5.2.9 a. The Chairman of the Nuclear Safety Audit and Review Board is responsible to the President on all activities for which the Review Board is responsible.
- b. The NSARB shall report to and advise the Senior Vice President, Production and Engineering, on those areas of responsibility specified in Sections 6.5.2.7 and 6.5.2.8.

RECORDS

- 6.5.2.10 Records of NSARB activities shall be prepared, approved, and distributed as indicated below:
- a. Minutes shall be recorded of all meetings of this Board. Copies of the minutes shall be forwarded within 14 days following each meeting to the Corporate Chairman of the Board, Senior Vice President, Production and Engineering and such others as the Chairman of the NSARB may designate.
- b. Reports of reviews encompassed by Section 6.5.2.7 e,f,g and h above, shall be prepared, approved and forwarded to the Senior Vice President, Production and Engineering within 14 days following completion of the review.
- c. Audit reports encompassed by Section 6.5.2.8 above, shall be forwarded to the Senior Vice President, Production and Engineering and to the management positions responsible for the areas audited within 30 days after completion of the audit.

6.6.1

The following actions shall be taken for Reportable Events:

- a. The Commission shall be notified and a report submitted pursuant to the requirements of Section 50.73 to 10 CFR Part 50, and
- b. Each Reportable Event shall be reviewed by the PORC and the results of this review shall be submitted to the NSARB and the Senior Vice President, Production and Engineering.

The following actions shall be taken in the event a Safety Limit is violated:

- a. The provisions of 10 CFR Section 50.36(c)(1)(i) shall be complied with immediately.
- b. The Safety Limit violation shall be reported to the Senior Vice President, Production and Engineering, to the NSARB and to the Commission immediately.
- c. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the PORC. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems or structures, and (3) corrective action taken to prevent recurrence.
- d. The Safety Limit Violation Report shall be submitted to the Commission, the NSARB, and the Senior Vice President, Production and Engineering within two weeks of the violation.

ATTACHMENT B

This safety evaluation addresses a proposed revisions to Section 6 of the Ginna Technical Specifications concerning an administrative change in title from Vice President, Production and Engineering to Senior Vice President, Production and Engineering.

This proposed amendment has been reviewed against the three factors of 10CFR50.92. It has been determined that the amendment does not involve a significant hazards consideration for the following reasons.

1. This change will not result in a significant increase in the probability or consequences of an accident previously evaluated.

The proposed revision does not involve the physical modification of the Plant or equipment. The proposed change is administrative in nature and affects no analyses or responses of the Plant to accident conditions.

2. These changes will not create the possibility of a new or different kind of accident previously evaluated.

As indicated above, the proposed revision to the Technical Specifications does not involve a physical modification to the Plant that could result in the creation of an accident not previously analyzed.

3. This change does not involve a significant reduction in the margins of safety.

The proposed revision does not in any way alter RG&E's commitment to maintaining a management structure that contributes to the safe operation and maintenance of Ginna Station.

TABLE 1

DETAILED TECHNICAL SPECIFICATION CHANGES

<u>Location</u>	<u>Description of Change</u>	<u>Reason for Change</u>
Page 6.2-1 Section 6.2.1b	Vice President, Production and Engineering changed to <u>Senior</u> Vice President, Production and Engineering.	Administrative Change in Title
Page 6.5-3 Section 6.5.1.6e	Vice President, Production and Engineering changed to <u>Senior</u> Vice President, Production and Engineering.	Administrative Change in Title
Page 6.5-4a Paragraph c.	Vice President, Production and Engineering changed to <u>Senior</u> Vice President, Production and Engineering.	Administrative Change in Title
Page 6.5-4a Section 6.5.1.8	Vice President, Production and Engineering changed to <u>Senior</u> Vice President, Production and Engineering.	Administrative Change in Title
Page 6.5-10 Paragraph m.	Vice President, Production and Engineering changed to <u>Senior</u> Vice President, Production and Engineering.	Administrative Change in Title
Page 6.5-11 Section 6.5.2.9b	Vice President, Production and Engineering changed to <u>Senior</u> Vice President, Production and Engineering.	Administrative Change in Title
Page 6.5-11 Section 6.5.2.10a	Vice President, Production and Engineering changed to <u>Senior</u> Vice President, Production and Engineering.	Administrative Change in Title
Page 6.5-11 Section 6.5.2.10b	Vice President, Production and Engineering changed to <u>Senior</u> Vice President, Production and Engineering.	Administrative Change in Title
Page 6.5-11 Section 6.5.2.10c	Vice President, Production and Engineering changed to <u>Senior</u> Vice President, Production and Engineering.	Administrative Change in Title
Page 6.6-1 Section 6.6.1b	Vice President, Production and Engineering changed to <u>Senior</u> Vice President, Production and Engineering.	Administrative Change in Title
Page 6.7-1 Section 6.7.1b	Vice President, Production and Engineering changed to <u>Senior</u> Vice President, Production and Engineering.	Administrative Change in Title
Page 6.7-1 Section 6.7.1d	Vice President, Production and Engineering changed to <u>Senior</u> Vice President, Production and Engineering.	Administrative Change in Title

