

ATTACHMENT A

Revise the Technical Specification pages as follows:

Remove

3.10-4

Insert

3.10-4

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limiting values within one day, the Overpower T trip setpoint and the Overtemperature T setpoint shall be similarly reduced.

- 3.10.2.3 Except for physics tests, if the quadrant to average power tilt ratio exceeds 1.02 but is less than 1.12, then within two hours:
- a. Correct the situation, or
  - b. Determine by measurement the hot channel factors, and apply Specification 3.10.2.2, or
  - c. Limit power to 75% of rated power.
- 3.10.2.4 If the quadrant to average power tilt ratio exceeds 1.02 but is less than 1.12 for a sustained period of more than 24 hours without known cause, or if such a tilt recurs intermittently without known cause, the reactor power level shall be restricted so as not to exceed 50% of rated power. If the cause of the tilt is determined, continued operation at a power level consistent with 3.10.2.2 above, shall be permitted.
- 3.10.2.5 Except for physics test, if the quadrant to average power tilt ratio is 1.12 or greater, within 2 hours either reduce the quadrant to average power tilt ratio to within its limit or reduce power to less than 50% of rated power. Within an additional 4 hours, either reduce the ratio to within its limit or be at hot shutdown. Subsequent operation for the purpose of measuring and correcting the tilt is permitted provided the power level does not exceed 50% of rated power and the Nuclear Overpower Trip setpoint is reduced by 50%.
- 3.10.2.6 Following any refueling and at least every effective full power month thereafter, flux maps, using the movable detector system, shall be made to confirm that

## ATTACHMENT B

Specification 3.10.2.5 associated with the quadrant to average power tilt ratio being greater than 1.12 requires a plant shutdown but does not specify any time limits. This Amendment corrects this inadequacy by providing guidance modeled after Standard Technical Specifications (Reference 1). Section 3.2.4 of Reference 1 requires if the high tilt ratio limit is exceeded, power be reduced to less than 50% within 2 hours. Operation may continue at less than 50% power provided the high flux setpoint is set equal to 55% power within the next 4 hours. This Amendment would require power to be reduced to less than 50% within 2 hours. Within the next 4 hours, the average power tilt ratio must be reduced to within its limit or the reactor must be at hot shutdown. The hot shutdown requirement is more conservative than Reference 1 but is consistent with the existing requirement that the reactor be in hot shutdown.

In accordance with 10CFR50.91, this change to the Technical Specifications has been evaluated to determine if the operation of the facility in accordance with the proposed Amendment would:

1. involve a significant increase in the probability or consequences of an accident previously evaluated; or
2. create the possibility of a new or different kind of accident from any accident previously evaluated; or
3. involve a significant reduction in the margin of safety.

Providing generically accepted guidance for an orderly power reduction does not increase the probability or consequences of an accident previously evaluated.

The guidance merely specifies the time by which the required power reductions must be accomplished. This does not create the possibility of a new or different accident.

Since the power reductions (50% and hot shutdown) are still required, there is no significant reduction in the margin of safety.

Based on the above discussions, Rochester Gas and Electric submits that the issues associated with this Amendment request are outside the criteria of 10CFR50.91 and a no significant hazards finding is warranted.

Reference 1. NUREG-0452, Rev. 4 "Standard Technical Specifications for Westinghouse Pressurized Water Reactors".

TABLE 1

DETAILED TECHNICAL SPECIFICATION CHANGES

<u>Location</u>	<u>Description of Change</u>	<u>Reason for Change</u>
Page 3.10-4	Inserted "within 2 hours either reduce the quadrant to average power tilt ratio to within its limit or reduce power to less than 50% of rated power. Within an additional 4 hours, either reduce the ratio to within its limit or be at hot shutdown."	Provide guidance for power reduction.