

Attachment A

1. Make the following changes in the Technical Specifications.

Remove

p.6.5-6
p.6.5-8

Insert

p.6.5-6
p.6.5-8 thru 6.5-8a

8610210298 861015
PDR ADOCK 05000244
P PDR

COMPOSITION (Continued)

- c. At least one qualified non-company affiliated technical consultant and others as required. Duly appointed consultant members shall have equal vote with company affiliated members of the Board.
- d. Three members from the staff of the R.E. Ginna Nuclear Power Plant.
- e. Members in (b) and (d) above to be designated by the Chairman of the Board and Chief Executive Officer.

ALTERNATES

6.5.2.3 Alternate members shall be appointed in writing by the NSARB Chairman to serve on a temporary basis; however, no more than two alternates shall participate in NSARB activities at any one time.

QUALIFICATIONS

6.5.2.4 The minimum qualifications of the Nuclear Safety Audit and Review Board with regard to the individual members shall be maintained at a level equal to or higher than the following:

- a. Reactor Engineering
Engineering graduate or equivalent with over eight years experience in the nuclear power field and over four years responsible engineering management.

MEETING FREQUENCY

- 6.5.2.5 At least semi-annually and as required on call of the Chairman.

QUORUM

- 6.5.2.6 A quorum shall consist of a majority of the principals and will include the Chairman or Vice Chairman. At least one of the quorum shall be a non-company affiliated technical consultant and no more than a minority of the quorum shall be members of the Plant staff.

REVIEW

- 6.5.2.7 The NSARB shall review:
- a. The safety evaluations for 1) changes to procedures, equipment or systems as described in the safety analysis report and 2) tests or experiments completed under the provision of 10CFR Section 50.59 to verify that such actions did not constitute an unreviewed safety question.
 - b. Proposed changes to procedures, equipment or systems which have been determined by the PORC to involve an unreviewed safety question as defined in 10CFR Section 50.59.
 - c. Proposed tests or experiments which have been determined by the PORC to involve an unreviewed safety question as defined in 10CFR Section 50.59.
 - d. Proposed changes in Technical Specifications or licenses.

- e. Violations of applicable statutes, codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance.
- f. Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety.
- g. All Reportable Events.

Attachment B

The requirements for an independent review committee are specified in ANSI/ANS 3.2-1982. While this standard allows the composition of the committee to vary between plant, non-plant company personnel and outside the company consultants, the current Ginna Technical Specifications are generally more restrictive; requiring membership of non-company consultants and preventing voting memberships by plant personnel.

The proposed change to the Technical Specification increases the membership of plant staff on the independent review board to three, and allows those three members to vote. Restrictions were then added to the quorum requirements to insure that plant personnel would not make up a majority of the board.

The proposed change will strengthen the review capability of the board by more fully incorporating the experience of members of the plant staff, while insuring the board independence consistent with the provisions of ANSI 3.2.

In accordance with 10CFR 50.91, the change to the Technical Specification has been evaluated against three criteria. It has been determined that operation of the facility in accordance with the proposed amendment would not:

1. involve a significant increase in the probability or consequences of an accident previously evaluated. This change is administrative in nature and does not alter the function of the Nuclear Safety Audit Review Board.
2. create the possibility of a new or different kind of accident from any accident previously evaluated. As discussed in 1 above, the proposed change is administrative and does not alter plant operation such that documented safety analyses would be effected.
3. involve a significant reduction in a margin of safety. The proposed change conforms to an accepted standard (ANSI 3.2 - 1982). This proposed change will not inhibit the Nuclear Safety Audit Review Board from performing its independent review function, but will allow its composition to reflect the broad based expertise of RG&E plant personnel.

Therefore, Rochester Gas and Electric submits that the issues associated with this amendment request are outside the criteria of 10CFR 50.91 and a no significant hazards finding is warranted.

