Attachment A

Revise the Technical Specification pages as follows:

Remove	Insert
3.5-22	3.5-22
3.6-5	3.6-5
3.6-6	3.6-6
3.6-7	3.6-7
	3.6-7A
3.6-11	3.6-11
3.8-1	3.8-1
4.4-7	4.4-7
4.4-8	4.4-8

TABLE 3.5-7

Radiation Accident Monitoring Instrumentation

Instrument		Minimum Channels Operable	Action
1.	Containment Area (R-29 and R-30)	2	1
2.	Noble Gas Effluent Monitors		
	i. Plant Vent (R-14)	1	1
	ii. A Main Steam Line (R-31)	1	1
	iii. B Main Steam Line (R-32)	1	1
	iv. Containment Purge (R-12A)	1*	1
	v. Air Ejector (R-15A)	1	1

Action Statements

Action 1 - With the number of operable channels less than required by the Minimum Channels Operable requirements, either restore the inoperable channel(s) to operable status within 7 days of the event, or prepare and submit a Special Report to the Commission within 30 days following the event outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to operable status.

* only when the shutdown purge system flanges are removed.

PENT. NO.	IDENTIFICATION/DESCRIPTION	ISOLATION BOUNDARY	MAXIMUM ISOLATION TIME *(SEC)	ISOLATION BOUNDARY	MAXIMUM ISOLATION TIME *(SEC)
121	Nitrogen to PRT	CV 528	NA	MV 547(8)	NA
121	Reactor Makeup water to PRT	CV 529	NA	AOV 508	60
121	Cont. Press. transmitter PT-945 (10)	PT 945	NA	MV 1819A	NA
121	Cont. Press. transmitter PT-946 (10)	PT 946	NA	MV 1819B	NA
123	Reactor Coolant Drain Tank (RCDT) to GA	AOV 1789	60	MV 1655(7)	NA
124	Excess letdown supply and return to heat exchanger	AOV 745 CV 743	60 NA	(11) (11)	NA NA
124	Post Accident air sample "C" fan	MV 1569 MV 1572	NA NA	MV 1571 MV 1574	NA NA
125	Component Cooling Water (CCW) from 1B RCP	MOV 759B	NA	(12)	NA
126	CCW from 1A RCP	MOV 759A	NA	(12)	NA
127	CCW to 1A RCP	CV 750A	NA	MOV 749A	60
128	CCW to 1B RCP	CV 750B	NA	MOV 749B	60
129	RCDT & PRT to Vent Header	AOV 1787 CV 1713	60 NA	AOV 1786	60
130	CCW to reactor support cooling	MOV 813	60	(19)	NA
131	CCW to reactor support cooling	MOV 814	60	(19)	NA
132	Mini-Purge exhaust	AOV 7970	5	AOV 7971	5
140	RHR pump suction from "A" Hot leg	MOV 701(20)	NA	(6)	NA

Proposed

PENT. NO.	IDENTIFICATION/DESCRIPTION	ISOLATION BOUNDARY	MAXIMUM ISOLATION TIME *(SEC)	ISOLATION BOUNDARY	MAXIMUM ISOLATION TIME *(SEC)
141	RHR-#1 pump suction from Sump B	MOV 850A(13)	NA	MOV 851A(13)	NA
142	RHR-#2 pump suction from Sump B	MOV 850B(13)	NA	MOV 851B(13)	NA
143	RCDT pump suction	AOV 1721	60	AOV 1003A AOV 1003B	60 60
201	Reactor Compart. cooling Unit A & B	MV 4757(16) MV 4636(16)	NA NA	(11) (11)	NA NA
202	"B" Hydrogen recombiner (pilot & main)	MV 1076B MV 1084B	NA NA	SOV IV-3B SOV IV-5B	NA Normally Closed NA Normally Closed
203	Contain, Press. transmitter PT-947 & 948	PT 947 PT 948	NA NA	MV 1819C MV 1819D	NA NA
203	Post accident air sample to "B" fan	MV 1563 MV 1566	NA NA	MV 1565 MV 1568	NA NA
204	Shutdown Purge Supply Duct	flange (22)	NA	AOV 5869 (22)	5
205	Hot leg loop sample	AOV 966C	60	MV 956D(14)	NA
206	Przr. liquid space sample	AOV 966B	60	MV 956E(14)	NA
206	"A" S/G sample	AOV 5735	60	MV 5733(7)	NA
207	Przr. Steam space sample	AOV 966A	60	MV 956F	NA
207	"B" S/G sample	AOV 5736	60	MV 5734(7)	NA
209	Reactor Compart. cooling Units A & B	MV 4758(16) MV 4635(16)	NA NA	(11) (11)	NA NA
210	Oxygen makeup to A & B recombiners	MV 1080A	NA	SOV IV-2A SOV IV-2B	NA Normally Closed NA Normally Closed

Proposed

PENT. NO.	IDENTIFICATION/DESCRIPTION	ISOLATION BOUNDARY	MAXIMUM ISOLATION TIME *(SEC)	ISOLATION BOUNDARY	MAXIMUM ISOLATION TIME *(SEC)
300	Shutdown Purge Exhaust Duct	flange (22)	NA	AOV 5879 (22)	5
301	Aux. steam supply to containment	MV 6151	NA	MV 6165(15)	NA
303	Aux. steam condensate return	MV 6175	NA	MV 6152(15)	NA
304	"A" Hydrogen recombiner (pilot and main)	MV 1084B MV 1076A	NA NA	SOV IV-5A SOV IV-3A	NA Normallly Closed NA Normallly Clos
305	Radiation Monitors R-11, R-12 & R-10A Auto Inlet Isol.	AOV 1597	60	MV 1596	NA
305	R-11, R-12 & R-10A Outlet	AOV 1599	60	AOV 1598	60
305	Post Accident air sampler (containment)	MV 1554 MV 1557 MV 1560	NA NA NA	MV 1556 MV 1559 MV 1562	60 NA NA
307	Fire Service Water	CV 9229	NA	AOV 9227	(18)
308	Service Water to "A" fan cooler	MV 4627(16)	NA	(11)	NA
309	Mini-Purge supply	AOV 7478	5	AOV 7445	5
310	Service Air to Contain.	CV 7226	NA	MV 7141	NA
310	Instrument Air to Contain.	CV 5393	NA	AOV 5392	60
311	Service Water from "B" fan cooler	MV 4630(16)	NA	(11)	NA
312	Service Water to "D" fan cooler	MV 4642(16)	NA	(11)	NA
313	Leakage test depressurization	flange	NA	MOV 7444	NA Normally Closed

Proposed

PENT. NO.	IDENTIFICATION/DESCRIPTION	ISOLATION BOUNDARY	MAXIMUM ISOLATION TIME *(SEC)	ISOLATION BOUNDARY	MAXIMUM ISOLATION TIME *(SEC)
315	Service Water from "C" fan cooler	MV 4643(16)	NA	(11)	NA
316	Service Water to "B" fan cooler	MV 4628(16)	NA	(11)	NA
317	Leakage test supply	flange	NA	MOV 7443	NA Normally Closed
318	Dead weight tester (decomissioned)	welded shut	NA	welded shut	NA
319	Service Water from "A" fan cooler	MV 4629(16)	NA	(11)	NA
320	Service water to "C" fan cooler	MV 4647(16)	NA	(11)	NA
321	A S/G Blowdown	AOV 5738	60	MV 5701(7)	NA
322	B S/G Blowdown	AOV 5737	60	MV 5702(7)	NA
323	Service Water from "D" fan cooler	MV 4644(16)	NA	(11)	NA
324	Demineralized water to Containment	CV 8419	NA	AOV 8418	NA
332	Cont. Press. Trans. PT-944, 949 & 950	PT 944	NA	MV 1819G	NA
		PT 949	NA	MV 1819F	NA
		PT 950	NA	MV 1819E	NA
332	Leakage test and hydrogen monitor instrumentation lines	MV 7448	NA	cap	NA
		MV 7452	NA	cap	NA
		MV 7456	NA	cap	NA
		SOV 921	NA	(21)	NA
		SOV 922	NA	(21)	NA
		SOV 923	NA	(21)	NA
		SOV 924	NA	(21)	NA

Proposed

(21) Acceptable isolation capability is provided for instrument lines by two isolation boundaries outside containment. One of the boundaries outside containment may be a Seismic Class 1 closed system which is subjected to Type C leak rate testing.

(22) The flanges at penetrations 204 and 300 can only be removed at cold or refueling shutdown. The flanges and associated double seals provide containment isolation and are a containment boundary for all modes of operation between cold shutdown and normal operation. During cold and refueling shutdown when the flanges are removed integrity is provided by the 48 inch valves.

[illegible]

[illegible]

3.8 REFUELING

Applicability

Applies to operating limitations during refueling operations.

Objective

To ensure that no incident could occur during refueling operations that would affect public health and safety.

Specification

3.8.1 During refueling operations the following conditions shall be satisfied.

a. The equipment door, or a closure plate that restricts air flow from the containment, and at least one personnel door in the equipment door or closure plate and in the personnel air lock shall be properly closed. In addition, all automatic containment isolation valves shall be operable or at least one valve in each line shall be locked closed. The 48 inch shutdown purge valves must also be operable or closed or the associated flange must be installed.

b. Radiation levels in the containment shall be monitored continuously.

c. Core subcritical neutron flux shall be continuously monitored by at least two source range neutron monitors, each with continuous visual indication in the control room and one with audible indication in the containment and control room available whenever core geometry is being changed. When core geometry is not being changed at

shutdown and depressurized until repairs are effected and the local leakage meets the acceptance criterion.

4.4.2.4 Test Frequency

a. Except as specified in b., c., and d. below, individual penetrations and containment isolation valves shall be tested during each reactor shutdown for refueling, or other convenient intervals, but in no case at intervals greater than two years.

b. The containment equipment hatch, fuel transfer tube, and shutdown purge system flanges shall be tested at each refueling shutdown or after each use, if that be sooner.

c. The containment air locks shall be tested at intervals of no more than six months by pressurizing the space between the air lock doors. In addition, following opening of the air lock door during the interval, a test shall be performed by pressurizing between the dual seals of each door opened, within 48 hours of the opening, unless the reactor was in the cold shutdown condition at the time of the opening or has been subsequently brought to the cold shutdown condition. A test shall also be performed by pressurizing between the dual seals of each door within 48 hours of leaving the cold shutdown condition, unless the doors have not been open since the last test performed either by pressurizing the space between the air lock doors or by pressurizing between the dual door seals.

4.4.3 Recirculation Heat Removal Systems

4.4.3.1 Test

a. The portion of the residual heat removal system that is outside the containment shall either be tested by use in normal operation or hydrostatically tested at 350 psig at the interval specified in 4.4.3.4.

b. Suction piping from containment sump B to the reactor coolant drain tank pump and the discharge piping from the pumps to the residual heat removal system shall be hydrostatically tested at no less that 100 psig at the interval specified in 4.4.3.4.

Attachment B

Containment purge and vent operations became a generic concern in 1978. Since that time containment purge and vent has been the subject of many letters between the Staff and Rochester Gas and Electric Corp. (RG&E). In Reference 1, the Staff transmitted to RG&E a Safety Evaluation Report (SER) which found RGE's interium commitments to be acceptable. The SER provides a good summary of the correspondance and the commitments made concerning this subject.

The existing purge and vent systems at Ginna consist of a 48 inch purge system and a 6 inch containment vent (depressurization) system. The major issue concerning the purge system is the operability of the 48 inch purge valves during a design basis accident - loss of coolant accident (DBA-LOCA). Therefore, RG&E has committed to maintaining the 48 inch purge valves closed while the reactor is critical until information demonstrating operability is submitted.

In response to the Staff's request to limit purge/vent operations to safety-related needs RG&E committed to limiting vent system operation to a total of 90 hours per year.

To permanently resolve the purge and vent issue RG&E has decided to modify the 48 inch purge system so that it will only be used when the reactor is in cold or refueling shutdown, and install a mini-purge system which will allow unlimited purging of containment. The technical specification changes presented in Attachment A are necessary to implement these modifications.

The following changes will be made to the 48 inch purge system: The inboard 48 inch, butterfly-type containment isolation valves from both the supply and exhaust lines will be removed. Each valve will be replaced with a special blind-flange type closure utilizing double O-ring seals to provide redundant containment isolation barriers. Test ports will be provided to permit periodic local leak rate testing of the double O-ring seal. The blind flange closures will be securely bolted in place during reactor operation and will only be removed during plant shutdowns. The existing outboard 48 inch, butterfly-type automatic containment isolation valves will remain in place to provide an isolation barrier during refueling operations.

Since the blank flanges have a double seal, it will no longer be necessary to rely on the outer 48 inch valves for containment isolation during power operation. During cold or refueling shutdown, the flanges could be removed and the outer valves will be relied upon for refueling integrity. Since the 48 inch valves are no longer relied upon for containment integrity the mechanical stops on the valves will be removed. These stops were installed to reduce stresses in the valves resulting from closure during a DBA-LOCA. Since the valves are no longer subject to a DBA-LOCA there is no reason to continue restricting air flow in the 48 inch system during shutdown.

A new mini-purge system will be installed to provide the capability to purge containment atmosphere during all modes of reactor operation. This 2000-cfm mini-purge system will consist of a pair of redundant blowers for supplying air to the containment through existing 6-inch Integrated Leak Rate Test (ILRT) vent line penetration 309. New 6 inch, air-operated, butterfly-type, inboard and outboard automatic containment isolation valves will be installed at penetration 309. Air will be exhausted through the existing 6 inch depressurization penetration 132 and will be ducted into the Auxiliary Building ventilation system where it will be filtered and monitored prior to its release to the environment via the plant vent. The existing 6 inch valves at penetration 132 will be replaced with new 8 inch, air-operated, butterfly-type, inboard and outboard containment isolation valves. All four new containment isolation valves will be automatic and will be fully-qualified to close within 5 seconds from the time the isolation setpoint is reached against the maximum containment pressures anticipated during a DBA-LOCA. The inboard ends of the mini-purge supply and exhaust lines will be equipped with 1/2-inch mesh debris screens.

The radiation accident monitor R-12A (Containment Purge) monitors the 48 inch purge exhaust. Since the 48 inch purge will only be operable during cold and refueling shutdown, R-12A need only be operable during cold and refueling shutdown. Therefore, Table 3.5-7 was modified to be consistant with operation of the shutdown purge system.

In accordance with 10 CFR 50.91, these changes to the Technical Specifications have been evaluated against three criteria to determine if the operation of the facility in accordance with 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 a margin of safety.

The modification does not involve an increase in the probability or consequences of an accident previously evaluated. Installing a mini-purge system and installing flanges on the 48 inch valves does not increase the probability of an accident because the flanges eliminate the effects of any malfunction of the 48 inch valves and the new mini-purge valves are small and inherently more reliable than the 48 inch valves. The consequences of any previously evaluated accident are not increased by the modification because the flanges prevent any accident associated with the 48 inch system and clearly any accident associated with the mini-purge system is less limiting than an accident associated with the 48 inch sytem.

The modification does not create the possibility of a new or different kind of accident. Replacing the 48 inch purge system with a mini-purge system basically decreases the size of the purge system and therefore does not create a new or different kind of accident.

The modification does not significantly reduce the margin of safety because the consequences of any accident with the mini-purge system would be less severe than an accident associated with the 48 inch system.

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

Reference 1 NRC letter from D.M. Crutchfield to R.W. Kober, "Completion of Generic Issue On Containment Purge and Vent Operation" June 21, 1984.