Attachment A

Revise the Technical Specification pages as follows:

Remove	Insert
page 4.1-5	page 4.1-5
page 6.9-2	page 6.9-2
page 6.9-7	page 6.9-7

TABLE 4.1-1

MINIMUM FREQUENCIES FOR CHECKS, CALIBRATIONS AND TEST OF INSTRUMENT CHANNELS

Channel Description	Check	Calibrate	Test	Remarks
1. Nuclear Power Range	S M*(3)	D(1) Q*(3)	B/W(2)(4) P(2)(5)	1) Heat balance calculation** 2) Signal to ΔT; bistable action (permissive, rod stop, trips) 3) Upper and lower chambers for axial offset** 4) High setpoint (≦109% of rated power) 5) Low setpoint (≦25% of rated power)
2. Nuclear Intermediate Range	S(1)	N.A.	P(2)	1) Once/shift when in service 2) Log level; bistable action (permissive, rod stop, trip)
3. Nuclear Source Range	S(1)	N.A.	P(2)	1) Once/shift when in service Bistable action (alarm, trip)
4. Reactor Coolant Temperature	S	R	M(1) (2)	1) Overtemperature - Delta T 2) Overpower - Delta T
5. Reactor Coolant Flow	S	R	M	
6. Pressurizer Water Level	S	R	M	
7. Pressurizer Pressure	S	R	M	
8. 4 Kv Voltage & Frequency	N.A.	R	M	Reactor Protection circuits only
9. Rod Position Indication	S(1,2)	N.A.	M**	1) With step counters 2) Log rod position indications each 4 hours when rod deviation monitor is out of service

* By means of the movable in-core detector system.

** Not required during hot, cold, or refueling shutdown but as soon as possible after return to power.

Proposed Amendment #1

Startup reports shall be submitted within (1) 90 days following completion of the startup test program, or (2) 90 days following resumption of commercial power operation, whichever is earliest. If the Startup Report does not cover both events (i.e., completion of startup test program, and resumption of commercial power operation), supplementary reports shall be submitted at least every three months until both events have been completed.

6.9.1.2 Monthly Operation Report. Routine reports of operating statistics and shutdown experience shall be submitted in accordance with 10 CFR 50.4 by the fifteenth of each month following the calendar month covered by the report. The monthly report shall include a narrative summary of operating experience describing the operation of the facility, including major safety related maintenance for the monthly period, except that safety related maintenance performed during the refueling outage may be reported in the monthly report for the month following the end of the outage rather than each month during the outage.

6.9.1.3 Annual Radiological Environmental Operating Report

A radiological environmental operating report covering the operation of the unit during the previous calendar year shall be submitted prior to May 1 of each year.

the PORVs or vent(s) on the transient and any other corrective action necessary to prevent recurrence.

6.9.2.4 Special reports shall be submitted in accordance with 10 CFR 50.4 within the time period specified for each report.

Attachment B

Page 4.1-5

Technical Specification Table 4.1-1 item 9 requires the rod position indication be tested monthly. The test is accomplished by moving the control rod a sufficient number of steps to cause the rod position indication to change. During hot, cold, or refueling shutdown when the rods are on the bottom, it is undesirable to withdraw control rods. In the case of refueling, it may be impossible to withdraw the rods. In addition, the rod position indication system is required to be operable only when the reactor is critical (Specification 3.10.5.1). Therefore, it is proposed that monthly rod position indication testing be required only when not at hot, cold, or refueling shutdown. The detailed change is listed on Table 1. This change is consistent with another Technical Specification (Table 4.1-2 item 6.a) for the control rods themselves which requires testing only when the rods are withdrawn.

In accordance with 10CFR 50.91, this change to the Technical Specifications has been evaluated against three criteria 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 previously evaluated; or

3. Involve a significant reduction in margin of safety.

The proposed changes do not involve a significant change in the probability or consequences of an accident previously evaluated. Removing the need to unnecessarily move control rods while at shutdown conditions decreases the probability of rod withdrawal.

The proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated because this change deletes testing while shutdown to show operability of a system that does not need to operate under shutdown conditions.

The proposed changes do not involve a significant reduction in margin of safety because the system is not required to operate during shutdown conditions.

Page 6.9-2, 6.9-7

By Federal Register Notice 51FR40303 dated November 6, 1986, the NRC amended 10CFR50.4 which establishes the procedures for submitting correspondence, reports, applications, or other written communications. These changes supersede and replace all existing requirements in any license condition or technical specification in effect on January 5, 1987.

The proposed changes to the Ginna Technical Specifications amend those provisions of Section 6.9 which conflict with the requirements of 10CFR50.4. In accordance with 10CFR50.91, these proposed changes were 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 only alters the addresses to which certain reports should be sent.

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 does not delete any requirements for submitting reports but changes the distribution requirements to comply with 10CFR50.4.

Therefore, 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.

Table 1

Detailed Technical Specification Changes

Location	Description of Change	Reason for Change
pp. 4.1-5 item 9	Add ** to test column.	Deleting testing requirements while at hot, cold, or refueling shutdown.
pp. 6.9-2, section 6.9.1.2	Deleted address to which monthly report is to be sent. Added requirement to conform to 10CFR50.4.	To conform to changes to 10CFR50.4.
pp. 6.9-7, section 6.9.2.4	Deleted address for Special Reports and added requirement to conform to 10CFR50.4.	To conform to changes to 10CFR50.4.