

ATTACHMENT A

Revise the Technical Specification pages as follows:

Remove

Page ii

Pages 6.2-1 through 6.2-7

Insert

Page ii

Pages 6.2-1 through 6.2-4

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## TABLE OF CONTENTS (cont'd)

	<u>Page</u>
4.8 Auxiliary Feedwater System	4.8-1
4.9 Reactivity Anomalies	4.9-1
4.10 Environmental Radiation Survey	4.10-1
4.11 Refueling	4.11-1
4.12 Effluent Surveillance	4.12-1
4.13 Radioactive Material Source Leakage Test	4.13-1
4.14 Shock Suppressors (Snubbers)	4.14-1
4.15 Fire Suppression System Test	4.15-1
4.16 Overpressure Protection System	4.16-1
 5.0 DESIGN FEATURES	
5.1 Site	5.1-1
5.2 Containment Design Features	5.2-1
5.3 Reactor Design Features	5.3-1
5.4 Fuel Storage	5.4-1
5.5 Waste Treatment Systems	5.5-1
 6.0 ADMINISTRATIVE CONTROLS	
6.1 Responsibility	6.1-1
6.2 Organization	6.2-1
6.2.1 Onsite and Offsite Organization	6.2-1
6.2.2 Facility Staff	6.2-2
6.3 Station Staff Qualification	6.3-1
6.4 Training	6.4-1
6.5 Review and Audit	6.5-1
6.5.1 Plant Operation Review Committee (PORC)	6.5-1
6.5.2 Nuclear Safety Audit and Review Board (NSARB)	6.5-5
6.5.3 Quality Assurance Group	6.5-11
6.6 Reportable Event Action	6.6-1
6.7 Safety Limit Violation	6.7-1
6.8 Procedures	6.8-1
6.9 Reporting Requirements	6.9-1
6.9.1 Routine Reports	6.9-1
6.9.2 Unique Reporting Requirements	6.9-3
6.10 Record Retention	6.10-1
6.11 Radiation Protection Program	6.11-1
6.12 (Deleted)	
6.13 High Radiation Area	6.13-1
6.14 (Deleted)	
6.15 Offsite Dose Calculation Manual	6.15-1
6.16 Process Control Program	6.16-1
6.17 Major Changes to Radioactive Waste Treatment Systems	6.17-1

### 6.2.1 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. There shall be an individual executive position in the offsite organization having corporate responsibility for overall plant nuclear safety. This individual 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. There shall be an individual management position in the onsite organization having responsibility for overall unit operation and shall have control over those resources necessary for safe operation and maintenance of the plant.

- d. The persons responsible for the training, health physics and quality assurance functions may report to an appropriate manager onsite, but shall have direct access to responsible corporate management at a level where action appropriate to the mitigation of training, health physics and quality assurance concerns can be accomplished.

#### 6.2.2 Facility Staff

The Facility organization shall be subject to the following:

- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1.
- b. At least one licensed Operator shall be in the control room when fuel is in the reactor.
- c. At least two licensed Operators shall be present in the control room during reactor start-up, scheduled reactor shutdown and during recover from reactor trips caused by transients or emergencies.
- d. All core alterations shall be directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.
- e. An individual qualified in radiation protection procedures shall be on site when fuel is in the reactor.



- f. A Fire Brigade of 5 members shall be maintained on site at all times.\* This excludes the two members of the minimum shift crew necessary for safe shutdown.
- g. Adequate shift coverage shall be maintained without routine heavy use of overtime. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions including senior reactor operators, reactor operators, health physicists, auxiliary operators, and key maintenance personnel. Changes to the guidelines for the administrative procedures shall be submitted to the NRC for review.

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\* Fire Brigade composition may be less than the minimum requirements for a period of time not to exceed 2 hours to accommodate unexpected absence of Fire Brigade members provided immediate action is taken to restore the Fire Brigade to the minimum requirements.



Table 6.2-1

## MINIMUM SHIFT CREW COMPOSITION

POSITION	NUMBER OF INDIVIDUALS REQUIRED TO FILL POSITION	
	RCS Above Cold Shutdown	Cold Shutdown & Refueling
SS	1	1
SRO	1	None
RO	2	1
AO	2	1
STA	1	None

SS - Shift Supervisor with a Senior Reactor Operators License

SRO - Individual with a Senior Reactor Operators License

RO - Individual with a Reactor Operators License

AO - Auxiliary Operator

STA - Shift Technical Advisor

Except for the Shift Supervisor, the Shift Crew Composition may be one less than the minimum requirements of Table 6.2-1 for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the Shift Crew Composition to within the minimum requirements of Table 6.2-1. This provision does not permit any shift crew position to be unmanned upon shift change due to an oncoming shift crewman being late or absent.

During any absence of the Shift Supervisor from the Control Room while the unit is above Cold Shutdown, an individual (other than the Shift Technical Advisor) with a valid SRO license shall be designated to assume the Control Room command function. During any absence of the Shift Supervisor from the Control Room while the unit is in Cold Shutdown or Refueling, an individual with a valid SRO or RO license shall be designated to assume the Control Room command function.



## ATTACHMENT B

This safety evaluation addresses proposed revisions to Section 6 of the Ginna Technical Specifications concerning administrative controls. Specifically requested is the deletion of the organization charts from Section 6.2. The NRC has approved a similar change for McGuire Nuclear Station on March 16, 1986.

The required content of the administrative controls section of the Technical Specifications is specified in 10CFR50.36c(5). The regulation does not specify that organization charts be included in the Technical Specifications. The proposed revision establishes guidance for the management organizations both onsite and offsite. The specific organization charts will be maintained in Chapter 13 of the UFSAR and the Ginna Station Quality Assurance Manual.

The minimum shift crew requirements that were incorporated into the organization charts are retained in the Technical Specifications as the proposed Table 6.2-1. This table, and the associated action statements for crew shortages, are consistent with Standard Technical Specifications and the requirements of 10CFR50.4.

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 removal of the organization charts does not alter the compliance of Ginna Technical Specifications with the requirements of 10CFR50.36. Organization charts will continue to be maintained in the UFSAR and the NRC will be informed of changes through annual updates as required by 10CFR50.71. Therefore, the probability of occurrence and the consequences of accidents addressed in the UFSAR will not be adversely affected.

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. As discussed above, the charts will be maintained in the UFSAR therefore clearly communicating the lines of authority and responsibility for nuclear plant operations.



— LINES OF SUPERVISION AND ADMINISTRATION  
 - - - LINES OF COMMUNICATION

# R. E. GINNA NUCLEAR POWER PLANT MANAGEMENT ORGANIZATION CHART

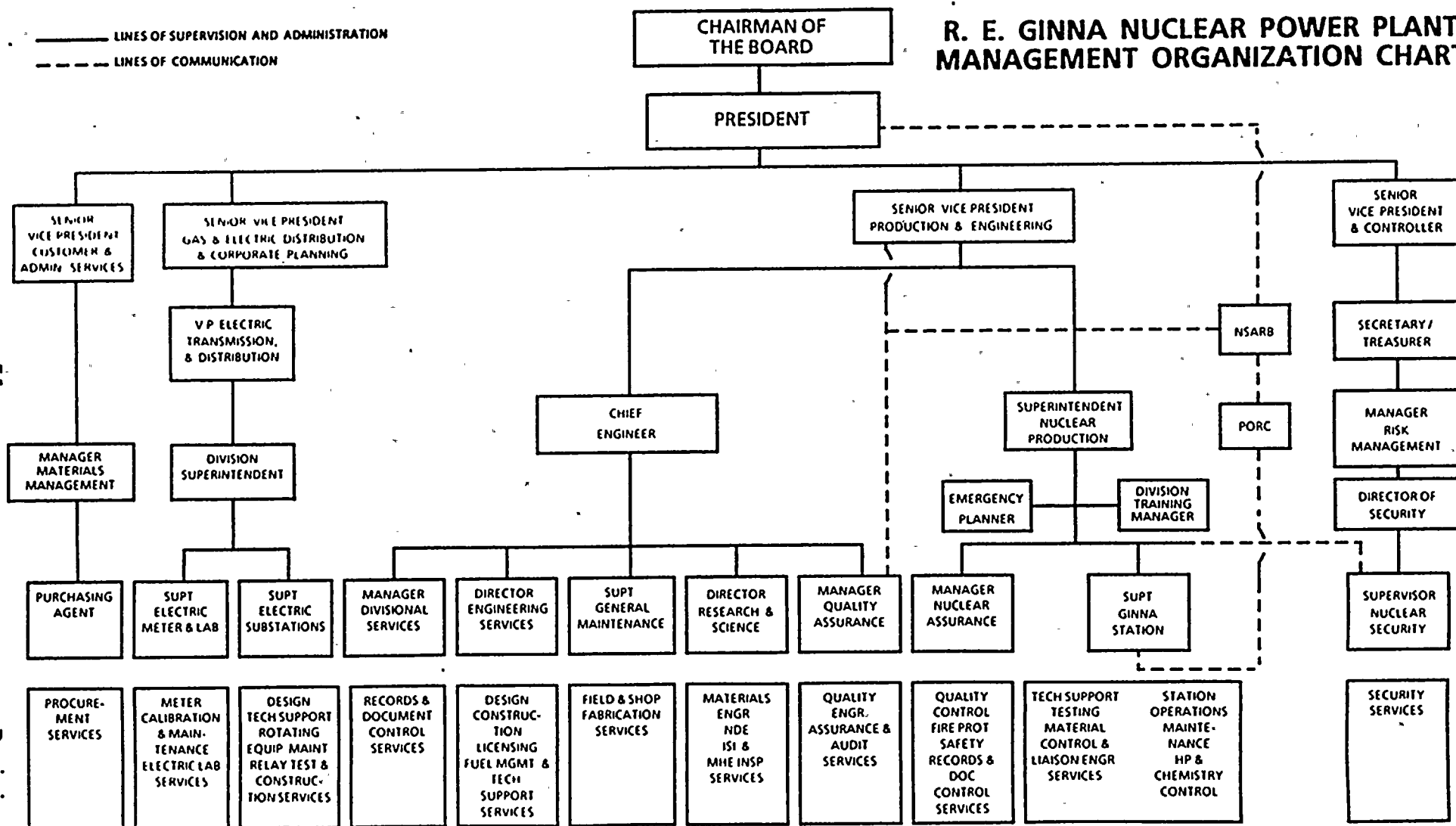


FIGURE 2-1



ROCHESTER GAS AND ELECTRIC CORPORATION  
R. E. GINNA STATION  
ORGANIZATION

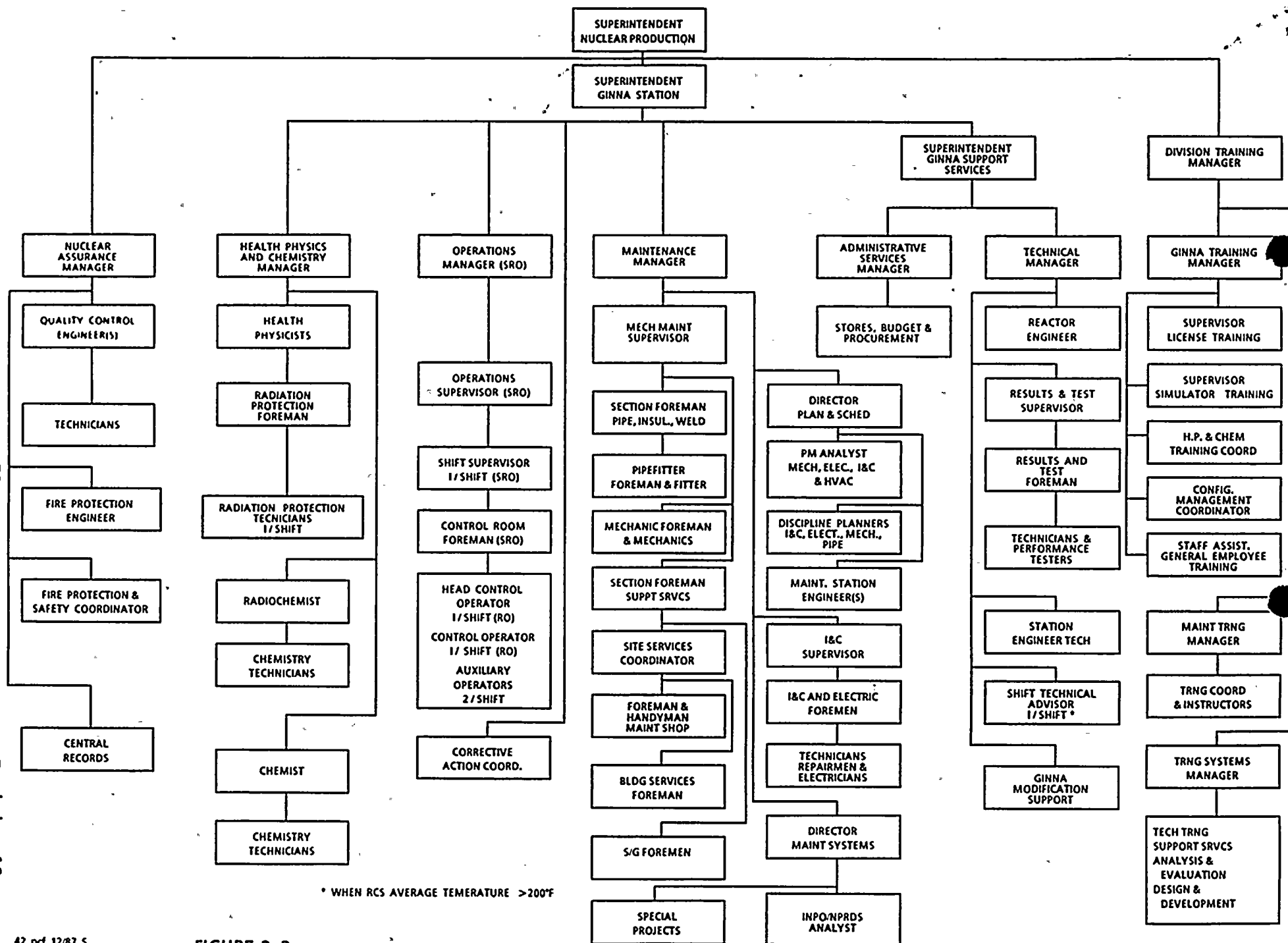


FIGURE 2-3