Attachment A

Revise the Technical Specification pages as follows:

Remove	Insert
pages 3.3-6 through 3.3-8	3.3-6 through 3.3-8

b. One containment spray pump may be inoperable provided the pump is restored to operable status within 3 days. During diesel generator load and safeguard sequence testing, both containment spray pumps may be inoperable for a period not to exceed one hour provided the RCS temperature is less than 350°F.

c. Any valve or piping in a system, required to function during accident conditions, may be inoperable provided it is restored to operable status within 72 hours.

d. One post accident charcoal filter unit and/or its associated fan cooler may be inoperable provided the unit is restored to operable status within 7 days.

e. The spray additive system may be inoperable for a period of no more than 3 days provided that both charcoal filter units are operable.

3.3.3 Component Cooling System

3.3.3.1 The reactor shall not be taken above cold shutdown unless the following conditions are met:

a. Both component cooling pumps are operable.

b. Both component cooling heat exchangers are operable.

c. All valves, interlocks and piping associated with the above components which are required

to function during accident conditions are operable.

3.3.3.2 The requirements of 3.3.3.1 may be modified to allow one of the following components to be inoperable at any one time. If the system is not restored to meet the conditions of 3.3.3.1 within the time period specified, the reactor shall be in hot shutdown within the next 6 hours. If the requirements of 3.3.3.1 are not satisfied within an additional 48 hours, the reactor shall be in the cold shutdown condition within the following 30 hours. If neither component cooling water loop is operable, the reactor shall be maintained below a reactor coolant system temperature of 350°F instead of at cold shutdown and corrective action shall be initiated to restore a component cooling water loop to operable status as soon as possible.

a. One component cooling pump may be out of service provided the pump is restored to operable status within 24 hours.

b. One heat exchanger or other passive component may be out of service provided the system may still operate at 100% capacity and repairs are completed within 24 hours.

3.3.4 Service Water System

3.3.4.1 The reactor shall not be taken above cold shutdown unless the following conditions are met:

a. At least two service water pumps, one on bus 17 and one on bus 18, and one loop header are operable.

b. All valves, interlocks, and piping associated with the operation of two pumps are operable.

3.3.4.2 Any time that the conditions of 3.3.4.1 above cannot be met, the reactor shall be placed in hot shutdown within 6 hours and in cold shutdown within an additional 30 hours.

3.3.5 Control Room Emergency Air Treatment System

3.3.5.1 The RCS temperature shall not be at or above 350°F unless the control room emergency air treatment system is operable.

3.3.5.2 The requirements of 3.3.5.1 may be modified to allow the control room emergency air treatment system to be inoperable for a period of 48 hours. If the system is not made operable within those 48 hours, the reactor shall be placed in hot shutdown within the next 6 hours and the RCS temperature less than 350°F in an additional 12 hours.

Basis

The normal procedure for starting the reactor is, first to heat the

Attachment B

Amendment No. 24 to the Technical Specification changed the RCS conditions above which the containment spray pumps were required to be operable from critical to cold shutdown. This requirement will no longer allow the current Plant practice of performing the emergency diesel generator load and safeguards sequence testing (Ginna Procedure RSSP 2.2) when RCS temperature is at approximately 300°F. This test is performed with one spray pump aligned for recirculation and the other in pull-stop. Therefore, neither pump would be able to respond to an automatic actuation signal although the pump in pull-stop could be manually actuated immediately and the other pump could be realigned within a relatively brief period of time.

The containment spray system, in conjunction with the containment fan coolers, is designed to remove sufficient heat from the containment atmosphere following an accident to maintain the containment pressure below its design limit (60 psig). The containment spray system is also capable of reducing the iodine and particulate fission product inventories in the containment atmosphere such that offsite doses resulting from a LOCA are within the guideline values of 10CFR100.

The proposed change to the Technical Specifications would allow both spray pumps to be inoperable for a period not to exceed 1 hour provided RCS temperature is less than 350°F. The design basis events for a containment pressure transient are the LOCA at 100 percent power or main steam line break (MSLB) occurring at zero percent reactor thermal power. Restricting RCS temperature to less than 350°F limits the amount of energy available for transfer to the containment atmosphere should a primary system pipe rupture or MSLB occur. For example, a comparison of reactor coolant specific enthalpies yields 559.8 BTU/lbm at 560°F and 2200 psia versus 322.5 BTU/lbm at 350°F and 600 psia. In addition energy from the fuel that would be transferred to the RCS during blowdown following a pipe rupture at 100 percent power, would not be available at the isothermal 350°F condition. Therefore, the peak containment pressure should remain well below the design limit of 60 psig.

The potential for offsite dose consequences for LOCA occurring at 350°F without containment spray pumps immediately operable, to be equal to or greater than those consequences resulting from a LOCA at 100% power with containment spray available, is limited. The 350°F isothermal condition of the fuel reduces the potential for cladding damage and release of fission products. The lower containment pressure reduces the driving force for leakage of any fission products released into the containment atmosphere to the outside environment. Finally, although the spray pumps are technically considered inoperable because they cannot be automatically actuated, they can be manually actuated or realigned within a brief period of time.

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 change involves the insertion of a test exception into the operability requirements for the containment spray pumps. This change does not involve a physical modification of the Plant or equipment. The probability of occurrence of the accidents addressed in the UFSAR cannot be affected.

   The containment spray system is designed to remove heat from the containment atmosphere following a postulated LOCA, main steam line break (MSLB) or any event where large amounts of energy transferred to containment could cause overpressurization. The proposed test exception minimizes the time that both spray pumps would be technically inoperable, and places a limit on RCS conditions such that the energy available for transfer to the containment atmosphere is also limited. The time allowed to conduct the test (1 hr) is short. Licensed Operators will be overseeing the testing and will be alert to the containment spray configuration. The probability of an accident occuring, during this time period, is less than 1.2×10^{-4} of the annual frequency of occurance of the design basis event. Therefore, the consequences of an accident previously evaluated (LOCA, MSLB) are not significantly increased in terms of the potential for containment design pressure to be exceeded.

   The offsite dose consequences due to the unavailability of containment spray would not be increased. The potential for fuel failure and release of fission products from the cladding is significantly reduced due to the low temperature (350°F) initial condition of the fuel at the time of the postulated LOCA. The lower containment pressure reduces the potential for containment leakage. Also manual realignment of a spray pump would occur in sufficient time to provide significant fission product removal capability.

2. These changes will not create the possibility of a new or different kind of accident previously evaluated.

   As indicated above the proposed change 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.

There are no significant reductions in the margins of safety. The containment spray system is designed to provide heat removal and removal of fission products from the containment atmosphere following a LOCA. Due to the reasons discussed above, the containment pressure and radiological consequences of a LOCA occurring at an RCS condition of less than 350°F and no spray system pumps available would be much less than the design basis accident condition. Therefore the margins of safety to containment failure and dose limits of 10CFR100 would not be reduced.

LIST OF CHANGES TO TECHNICAL SPECIFICATIONS

Location of Change	Description
p. 3.3-6, Section 3.3.2.2b	Added phrase "During diesel generator load and safeguard sequence testing, both containment spray pumps may be inoperable for a period not to exceed one hour provided the RCS temperature is less than 350°F."
p. 3.3-7, 3.3-8	No changes to these pages. Pages retyped only.