ATTACHMENT A

Revise the Technical Specification pages as follows:

Remove	Insert
3.5-5	3.5-5
3.5-6	3.5-6

Amendment 74

TABLE 3.5-1
PROTECTION SYSTEM INSTRUMENTATION

NO.	FUNCTIONAL UNIT	1 TOTAL NO. of CHANNELS	2 NO. of CHANNELS TO TRIP	3 MIN. OPERABLE CHANNELS	4 PERMISSIBLE BYPASS CONDITIONS	5 OPERATOR ACTION IF CONDITIONS OF COLUMN 1 OR 3 CANNOT BE MET	6 CHANNEL OPERABLE ABOVE
1.	Manual	2	1	2		1	when RCCA is withdrawn
2.	Nuclear Flux Power Range low setting	4	2	3	For low setting, 2 of 4 power range channels greater than 8% F.P.	2 Note 1	when RCCA is withdrawn
	high setting	4	2	3		2	when RCCA is withdrawn
3.	Nuclear Flux Intermediate	2	1	1	2 of 4 power range channel greater than 8% F.P.	3 Note 1	when RCCA is withdrawn
4.	Nuclear Flux Source Range	2	1	2	1 of 2 intermediate	4 Note 1	Note 2
5.	Overtemperature ΔT	4	2	3		2	Hot Shutdown
6.	Overpower ΔT	4	2	3		2	Hot Shutdown
7.	Low Pressurizer Pressure	4	2	3		2	8% Power
8.	Hi Pressurizer Pressure	3	2	2		5	Hot Shutdown
9.	Pressurizer - Hi Water Level	3	2	2		5	5% Power
10.	Low Flow in One Loop ($\geq$ 50% F.P.)	3/loop	2/loop (either loop)	2/loop (both loops)		5	8% Power
	Low Flow Both Loops (8.5%-50% F.P.)'	3/loop	2/loop (both loops)	2/loop (either loop)		6	8% Power

Proposed

Amendment 24

TABLE 3.5-1 (Continued)
PROTECTION SYSTEM INSTRUMENTATION

NO.	FUNCTIONAL UNIT	1 TOTAL NO. of CHANNELS	2 NO. of CHANNELS TO TRIP	3 MIN. OPERABLE CHANNELS	4 PERMISSIBLE BYPASS CONDITIONS	5 OPERATOR ACTION IF CONDITIONS OF COLUMN 1 OR 3 CANNOT BE MET	6 CHANNEL OPERABLE ABOVE
11.	Turbine Trip	3	2	2		5	50% Power
12.	Steam Flow Feedwater flow mismatch with Lo Steam Generator Level	2 SF-FF and 2 SG level per loop	1 SF-FF coincident w/1 Lo SG level in same loop	2 SF-FF or 2 Lo SG level per loop		6	Hot Shutdown
13.	Lo Lo Steam Generator Water Level	3/loop	2/loop	2/loop		5	Hot Shutdown
14.	Undervoltage 4 KV Bus	2/bus	1/bus (both buses)	2/bus (on either bus)		6	8% Power
15.	Underfrequency 4 KV Bus	2/bus	1/bus (both buses)	2/bus (on either bus)		6	8% Power
16.	Quadrant power tilt monitor (upper & lower ex-core neutron detectors)	1	NA	1		Log individual upper & lower ion chamber currents once/hr & after a load change of 10% or after 48 steps of control rod motion	Hot Shutdown

Proposed

The P-10 permissive allows manual blocking of the intermediate range rod stop, the intermediate range high flux trip, and low setpoint of the power range high flux trip above 10% power. These trips are used to mitigate the consequences of a rod withdrawal transient from subcritical. P-10 also supplies an automatic permissive to P-7.

The proposed Technical Specification change would allow the above trips to be bypassed (blocked) and the automatic permissive to P-7 be generated at 8% power. This change is necessary because P-7 permissive is required at 8.5% power. Since one of the inputs to P-7 comes from the same power range bistable that supplies P-10, P-10 must be actuated at 8% power to satisfy the requirements for P-7. P-7 automatically unblocks the following reactor trips: 2 loop low flow, reactor coolant pump bus undervoltage, reactor coolant pump bus underfrequency, pressurizer low pressure, and turbine trip with P-9. These trips are associated with the 130 MW which is the upper limit of heat removal while on natural circulation.

The only transient analysis which uses this trip is a slow rod withdrawal. (Boron dilution is bounded by the slow rod withdrawal.) The only effect of reducing P-10 to 8% would be that a rod withdrawal accident (RWA) starting from 8% would be terminated by high flux and overtemperature ΔT versus the intermediate and reduced high power trips. An evaluation performed on the RWA starting from 8% and 10% for various reactivity insertion rates shows approximately the same DNBR when the RWA is initiated from 8% versus 10% power. The maximum decrease in DNBR was approximately 0.007. Further, there is substantial margin between the DNBR for a RWA from 10% and the limiting RWA from 100% power. The DNBR for a RWA starting from 8% will also be greater than the DNBR for the limiting RWA started from 100% power. Therefore, reducing P-10 to 8% has negligible effect on the Ginna Safety Analysis and the minimum DNBR for all RWAs is unchanged.

The specific Technical Specification changes are listed on Table 1. In addition to the above changes, the power level at which the P-7 trip functions are required to be operable has been changed from 5% to 8% on Table 3.5-1. The reason for this change is that at Ginna, a function is not considered to be operable while it is blocked. Since the P-7 trip functions are not unblocked until 8%, they are not considered operable until 8% even though they are automatically unblocked. The change from 5% to 8%, the point at which the trips are considered operable, maintains the setpoint within the analyzed range of up to 8.5% power.

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 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 from any accident previously evaluated; or

3. involve a significant reduction in a margin of safety.

Reducing the P-10 setpoint from 10% to 8%, or increasing the operability requirement of a blocked function from 5% to 8% does not increase the frequency (probability) of a previously evaluated accident.

The consequences of an accident are not affected by the operability of a blocked trip function. Reduction in the P-10 setpoint has a negligible effect on the DNB associated with the RWA. Since the DNB criteria is met, there is no increase in the consequences of the accident.

The subject changes do not create the possibility of a new or different accident. Since the accident acceptance criteria are met, there is no reduction in any margin of safety.

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.

TABLE 1

DETAILED TECHNICAL SPECIFICATION CHANGES

Location	Description of Change	Reason for Change
Table 3.5-1		
Item 2.	Changed 10% to 8%	Make Specification consistent with equipment
Item 3.	Changed 10% to 8%	Make Specification consistent with equipment
Item 7.	Changed 5% to 8%	Make Specification consistent with interpretation of operability
Item 10.	Changed 5% to 8%	Make Specification consistent with interpretation of operability
Item 14.	Change 5% to 8%	Make Specification consistent with interpretation of operability
Item 15.	Change 5% to 8%	Make Specification consistent with interpretation of operability