ATTACHMENT A

Revise the Technical Specification pages as follows:

Remove	Insert
4.2-2	4.2-2
-----	4.2-3

and 2,000 respectively. The inspection program during each third of the first inspection interval provides for examination of all welds at design basis break locations and one-third of all welds at locations where a weld failure would result in unacceptable consequences. During each succeeding inspection interval, the program shall provide for an examination of each of the design basis break location welds, and each of the welds at locations where a weld failure would result in unacceptable consequences.

4.2.1.4 The inspection intervals for Steam Generator Tubes shall be specified in the "Inservice Inspection Program" for the applicable forty month period commencing with May 1, 1973.

4.2.1.4.a Steam generator tubes that have imperfections greater than 40% through wall, as indicated by eddy current, shall be repaired by plugging or sleeving.

4.2.1.4.b Steam generator sleeves that have imperfections greater than 30% through wall, as indicated by eddy current, shall be repaired by plugging.

4.2.1.5 Inservice Inspection of ASME Code Class 1, Class 2 and Class 3 components (Quality Groups A, B and C) shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a(g), except where specific written relief has been granted by the NRC pursuant to 10 CFR 50, Section 50.55a(g)(6)(i).

4.2.1.6 The inspection interval for the Inservice Pump and Valve Testing Program shall be ten year intervals commencing with January 1, 1981, 1990 and 2000.

Basis:

The inservice inspection programs provide assurance for the continued structural integrity of the structures, components and systems of Ginna Station. The programs comply with the ASME Boiler and Pressure Vessel Code Section XI "Rules for Inservice Inspection of Nuclear Power Plant Components" as practicable, with due consideration to the design and physical access of the structures,

Basis (Cont'd)

components and systems as manufactured and constructed. This compliance will constitute an acceptable basis for satisfying the requirements of General Design Criterion 32, Appendix A of 10 CFR Part 50 and the requirements of Section 50.55a, paragraph g of 10 CFR Part 50.

The repair criteria of 4.2.1.4.a and 4.2.1.4.b are based on the requirements of USNRC Regulatory Guide 1.121, "Bases for Plugging Degraded PWR Steam Generator Tubes" as implemented by RG&E (Reference 1). This guide describes a method acceptable to the NRC staff for establishing the limiting safe conditions of tube degradation of steam generator tubing. The repair criteria is based on structural allowances, an allowance for eddy current measurement error and an allowance for degradation during the operating period. These allowances are added together to determine the repair criteria which is typically 40% for steam generator tubes. Based on calculations the appropriate sleeve plugging limit is a 42% thru wall defect. In order to allow for conservatism, a 30% plugging limit for sleeves will be utilized.

Reference 1: "Steam Generator Rapid Sleeving Program Design Verification Report", R.E. Ginna Nuclear Power Plant, August 1982.

The purpose of this Amendment is to make the steam generator tube and sleeve repair criteria part of the Technical Specifications. These criteria are already included in the Inservice Inspection Program as defined in Appendix B to the Ginna Station QA Manual, but have not specifically appeared in the Technical Specifications.

The repair criteria are based on the recommendations of USNRC Regulatory Guide 1.121, "Bases for Plugging Degraded PWR Steam Generator Tubes". The repair criteria are based on structural allowances and incorporate eddy current measurements uncertainties and allowances for degradation during the operating period. Combining these allowances and uncertainties results in a repair criteria of 40% for tubes and 30% for sleeves

Table 1 depicts the specific Technical Specification changes.

In accordance with 10CFR50.91, these changes to the Technical Specifications have been evaluated 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.

The proposed change involves adding an existing criteria to Technical Specifications. Adding the criteria to the Specifications does not increase the probability or consequences of a previously evaluated accident. A new or different kind of accident is not created. There is no significant reduction in a margin of safety.

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
Page 4.2-2 Section 4.2.1.4	The following Specification was added: 4.2.1.4.a Steam generator tubes that have imperfections greater than 40% through wall, as indicated by eddy current, shall be repaired by plugging or sleeving.	To add steam generator tube repair criteria to the Specifications
Page 4.2-2 Section 4.2.1.4	The following Specification was added: 4.2.1.4.b Steam generator sleeves that have imperfections greater than 30% through wall, as indicated by eddy current, shall be repaired by plugging.	To add steam generator sleeve plugging criteria to the Specifications
Page 4.2-3	Added bases to cover 40% and 30% criteria.	Incorporation of 40% and 30% criteria.