

ATTACHMENT A

Revise the Technical Specification pages as follows:

Remove

3.10-20

Insert

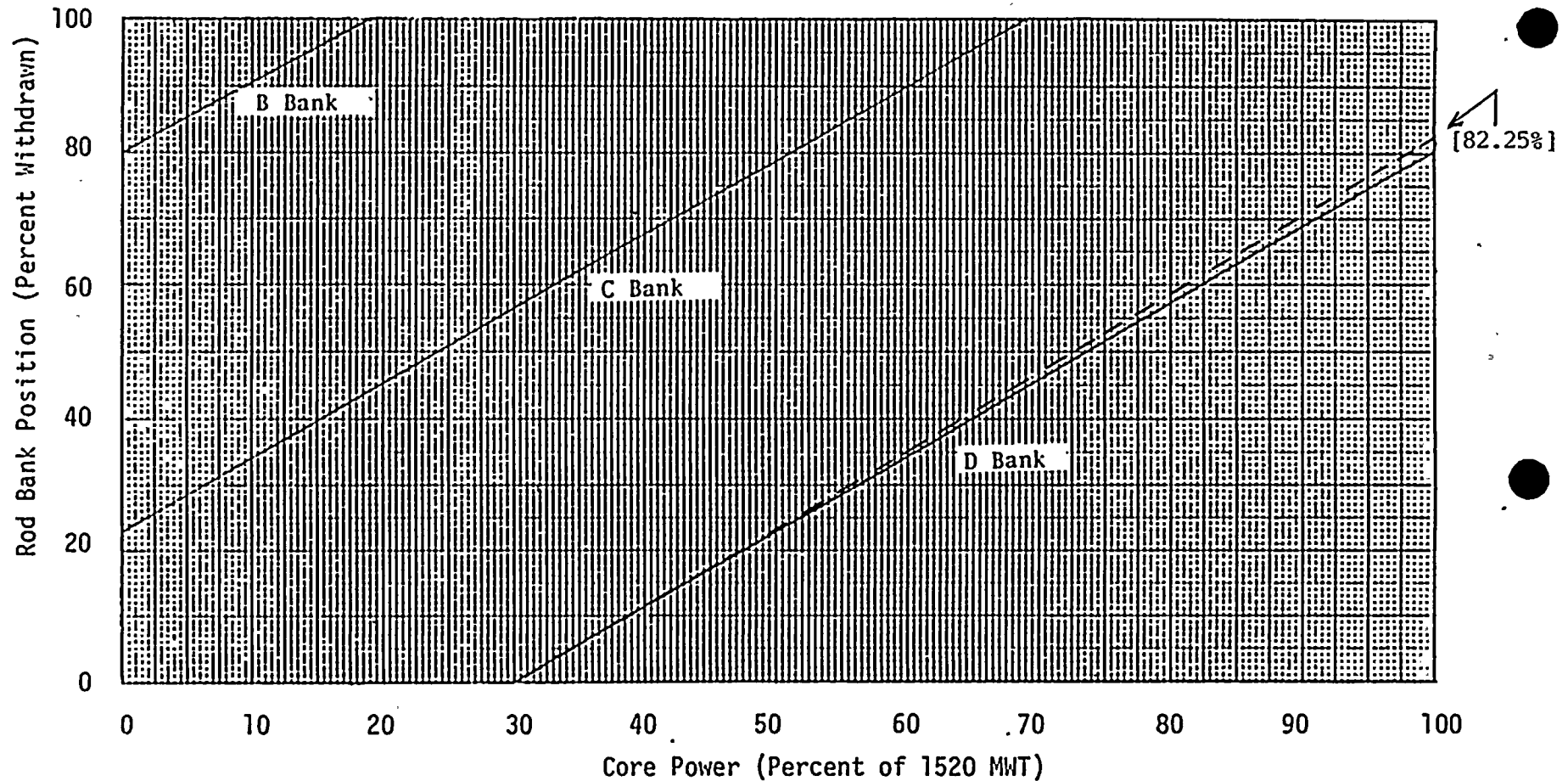
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FIGURE 3.10-1

CONTROL ROD INSERTION LIMITS VERSUS CORE POWER

FOR BOL THROUGH EOL

[----- Dashed line is applicable only for Cycle 19 with cycle burnup greater than 5250 MWD/MTU providing Cycle 18 burnup has exceeded 12150 MWD/MTU.]



3.10-20

Proposed



## ATTACHMENT B

The Cycle 19 reload has been designed by Westinghouse using standard design methodology. Based on this methodology, all criteria for the reload are met provided a slight adjustment is made to the bank D insertion limits. This Technical Specification change will slightly modify the rod insertion limits for Cycle 19 to ensure all criteria are met.

The adjustment is illustrated on proposed Technical Specification Figure 3.10-1. The adjustment is only necessary for Cycle 19 provided Cycle 18 exceeds a burnup of 12150 MWD/MTU and is only applicable for Cycle 19 burnups from 5250 to 9500 MWD/MTU. (Since 9500 MWD/MTU is close to Cycle 19 end of cycle the 9500 has been extended to end of cycle for this application).

As stated in the attached Reload Safety Evaluation the amount by which the  $1.66 F_{\Delta}$  limit could be exceeded with the current insertion limits varies from 0% at a Cycle 18 burnup of 12150 MWD/MTU to a maximum of 0.33% at a Cycle 18 burnup of 12300 MWD/MTU. The limit is not exceeded if the bank D insertion limit is raised by 2.25% (5 steps) at full power as illustrated on proposed Technical Specification Figure 3.10-1. Since this change is not applicable to future cycles, it is presented as a change with a limited period of applicability on proposed Figure 3.10-1 with appropriate qualifiers. No other safety criteria are affected by the Cycle 19 core reload.

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 would require the bank D control rods to be withdrawn 5 steps further during full power operation. Withdrawing the rods above the insertion limit increases the shutdown margin, decreases the ejected rod worth, reduces power peaking, and does not alter stuck rod worth. Therefore, withdrawing the rods is conservative and ensures that the safety criteria for the Cycle 19 reload are met, there is no significant increase in the probability or consequences of an accident previously evaluated. Ensuring the criteria are met does not create the possibility of a new or different kind of accident or result in a 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.



ATTACHMENT

Westinghouse Reload Safety Evaluation for Cycle 19

This evaluation demonstrates that the Cycle 19 core reload satisfies the criteria for Westinghouse fuel and the burnup criteria for Exxon fuel (Reference A and B).

References:

- A. XN-NF-81-01, "R.E. Ginna Nuclear Plant Cycle 11 Safety Analysis Report", February 1981
- B. RG&E to NRC letter, dated April 10, 1984, "Lead Test Assembly Program" and NRC to RG&E letter, dated May 9, 1984, "Lead Test Assembly Program" - acceptance.



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