

ATTACHMENT A

Revise the Technical Specification pages as follows:

Remove

6.5-9

Insert

6.5-9

9102250111 910215  
PDR ADDCK 05000244  
PDR

## REVIEW (Continued)

- h. Any indication of an unanticipated deficiency in some aspect of design or operation of safety related structures, systems, or components.
- i. Reports and meeting minutes of the Plant Operations Review Committee.

## AUDITS

- 6.5.2.8 The NSARB shall direct the establishment of an audit program and evaluate audits performed to ensure safe facility operation. Audits shall encompass:
- a. The conformance of facility operation to all provisions contained within the Technical Specifications and applicable license conditions at least once per year.
  - b. The performance, training and qualifications of the operating and technical staff at least once a year.
  - c. The results of all actions taken to correct deficiencies occurring in facility equipment, structures, systems or method of operation that affect nuclear safety at least once per six months.
  - d. The performance of all activities required by the Quality Assurance Program for R. E. Ginna Nuclear Power Plant to meet the criteria of Appendix B, 10 CFR 50, at least once per 24 months.
  - e. The Radiation Emergency Plan and implementing procedures at least at the frequency required by 10 CFR 50.54(t).
  - f. The Station Security Plan and implementing procedures at least at the frequency required by 10 CFR 73.40(d).



## Attachment B

The purpose of the proposed amendment is to provide clarification of which quality assurance activities are subject to audit considerations, through reference to the Nuclear Regulatory Commission (NRC) endorsed Quality Assurance Program for R. E. Ginna Nuclear Power Plant. The proposed amendment also changes the audit frequency, described in Technical Specification 6.5.2.8d, from "at least once per year" to "at least once per 24 months."

The proposed change to provide clarification to Specification 6.5.2.8d is considered to be an administrative change. Since the proposed change only provides clarification, no reduction of the level of authority and responsibility thereof, would result from the administrative change.

The proposed change to the audit frequency from "at least once per year" to "at least once per 24 months" would not reduce the overall effectiveness to ensure that all programs/activities required by the Quality Assurance Program meet the criteria of Appendix B, 10 CFR 50.

The proposed change facilitates Ginna's audit and assessment planning process which is based on group performance and management concerns. The purpose of assessments performed as part of the quality program is to assist management in evaluating the performance of station activities and the effectiveness of management controls and programs.

The audit program at Ginna has been in transition over the past year to facilitate the conduct of performance based audits and assessments. These improvements are being incorporated into the Ginna Quality Assurance Program submittal. Furthermore, implementation of the proposed amendment will continue to provide management with timely and relevant information regarding performance and compliance of all activities to meet the criteria of Appendix "B", 10 CFR Part 50.

The proposed amendment permits more efficient use of resources which in effect will enable the conduct of more assessments, both special and diagnostic. This approach, i.e., group performance based assessments, is encouraged in NUREG-0800, Revision 0, Standard Review Plan, dated August 1990.

Consistent with the above, selection of an assessment frequency should be based on the importance of the activity for safe and reliable station operation, past performance, suspected weak areas, and regulatory requirements rather than a schedule predicated by the abrupt 12 month requirement.

The overall effectiveness to meet the criteria of Appendix B, 10 CFR 50 will not be reduced since:

- (1) personnel responsible for carrying out self-assessment functions, including safety committee activities (PORC and NSARB) and continuing Quality Assurance audits are cognizant of day-to-day activities and

- (2) act in a management advisory function to identify and alleviate anomalous performance and precursors of potential problems.

Further, the proposed amendment is consistent with the required audit frequency of 24 months identified in NUREG-0452, "Standard Technical Specifications for Westinghouse Pressurized Water Reactors."

#### 10 CFR 50.92 EVALUATION

The proposed change in the Ginna Technical Specifications does not involve a significant hazard consideration. The basis for this determination is as follows:

- There is no significant increase in the probability or consequences of an accident previously evaluated because accident conditions and assumptions are not affected by the proposed Technical Specification change.
- The possibility of a new or different kind of accident from any accident previously evaluated is not created. In matters related to nuclear safety, all accidents are bounded by previous analysis. The proposed change does not add or modify any equipment or system design nor does it involve any changes in the operation of any plant system. The absence of a hardware change means that the accident initiators remain unaffected, so no unique accident probability is created.
- The proposed amendment does not involve a significant reduction in the margin of safety as defined in the basis for any Technical Specification because the proposed amendment will continue to ensure that (1) performance based audits and assessments shall be in sufficient depth, (2) participating members are satisfied that items under review do not otherwise constitute a concern and (3) all activities required by the Quality Assurance Program meet the criteria of Appendix B, 10 CFR 50. Further, the proposed amendment permits more efficient use of resources which in effect will enable the conduct of more assessments, both special and diagnostic. In addition to the above, this proposed amendment is consistent with the required audit frequency of 24 months identified in NUREG-0452, "Standard Technical Specifications for Westinghouse Pressurized Water Reactors." Therefore, the proposed change to the operating license does not involve a significant reduction in the margin of safety as defined in the basis for any Technical Specification.

#### CONCLUSION

On the basis of the above, RG&E has determined that the amendment request does not involve a significant hazards consideration.