

ATTACHMENT A

Revise the Technical Specification pages as follows:

Remove

5.1-1  
Figure 5.1-1

Insert

5.1-1  
Figure 5.1-1

5.0

DESIGN FEATURES

5.1

Site

The R. E. Ginna Nuclear Power Plant is located on property owned by Rochester Gas and Electric Corporation at a site on the south shore of Lake Ontario, approximately 16 miles east of Rochester, New York.

5.1.1

For the purposes of implementing Ginna Radiological Technical Specifications, and for evaluating radiological releases to the Unrestricted Area, the Unrestricted Area Boundary is assumed to coincide with the Exclusion Area Boundary. The site map shown in Figure 5.1-1 depicts the Ginna Exclusion Area Boundary (also called Unrestricted Area Boundary) location.

5.1.2

The site boundary shall be that line beyond which the land is neither owned, nor released, nor otherwise controlled by Rochester Gas & Electric Corporation.

# GINNA SITE MAP

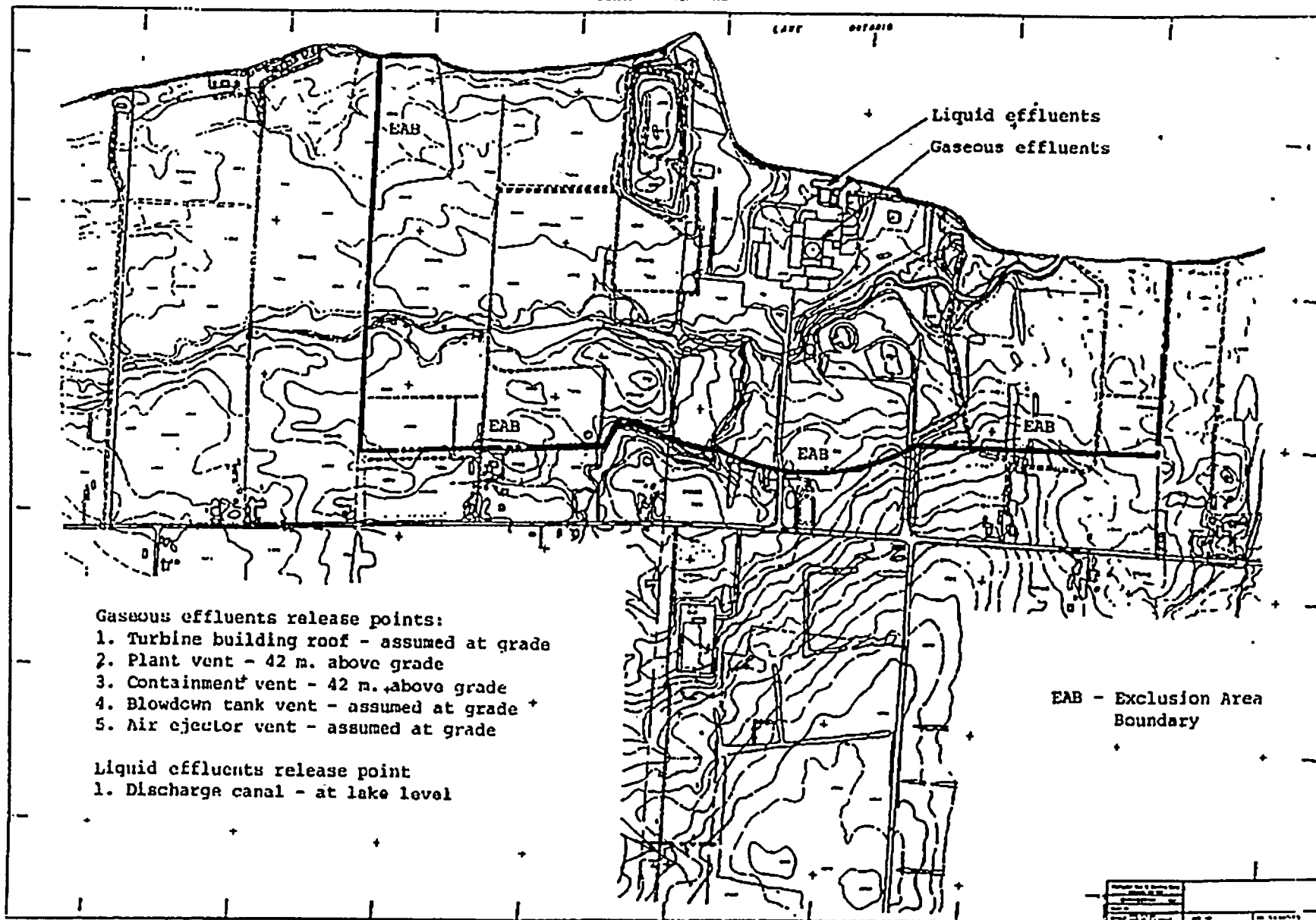


FIGURE 5.1-1

## ATTACHMENT B

### INTRODUCTION

The proposed Amendment redefines Ginna's site area boundary (the RG&E property line) in terms of text rather than a depiction, as shown on Technical Specification Figure 5.1-1. The proposed change will define the Site Area Boundary line as:

"The site boundary shall be that line beyond which the land is neither owned, nor leased, nor otherwise controlled by Rochester Gas and Electric Corporation."

The proposed change to describe the site area boundary in terms of text will compensate for the removal of Ginna's Site Area Boundary from existing Technical Specification Figure 5.1-1. This proposed change does not alter the substance of the guidance provided in NUREG-0133, but rather only provide flexibility.

### JUSTIFICATION FOR CHANGE

10CFR50.36(c)(4) provides criteria for inclusion of appropriate material in Section 5 of the Technical Specifications. 10CFR50.36(c)(4) states:

"Design Features to be included are those features of the facility such as materials of construction and geometric arrangements, which, if altered or modified, would have a significant effect on safety and are not covered in categories described in paragraphs (c)(1), (2), and (3) of this section."

Hence, 10CFR50.36(c)(4) does not apply to whether or not a graphic depiction of the site boundary on a map be included in Section 5 of the Technical Specifications. However, NUREG-0133 does require, in part, "in preparing proposed Technical Specifications, Figure 5.1-1 should consist of a map of the site area showing the exclusion boundary, as defined in 10CFR100.3(a) and the unrestricted area boundary, as defined in 10CFR20.3(a)(17)." The proposed change meets the intent of guidance provided in NUREG-0133.

The proposed change does not alter or modify the Security or Emergency plans. Changes to either the Security or Emergency Plans are governed in accordance with the criteria in 10CFR50.54(p) and (q) respectively. The proposed change allows us to change the actual site area boundary, if deemed necessary, without the need for an Amendment to the Technical Specifications. Proposed changes to UFSAR Figure 2.1-2 are governed pursuant to 10CFR50.71(e). The Radiological Effluent Technical Specifications are unchanged by this proposed change. Appendix I radiological release calculations will continue to be evaluated for the unrestricted area as described in Specification 5.1.1. Therefore, the proposed change will not result in any significant environmental impact.

## 10CFR50.92 EVALUATION

The proposed change in the Ginna Technical Specifications does not involve a significant hazards 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 the accident conditions and assumptions are not affected by the proposed Technical Specification change. The proposed change does not alter or modify the Security or Emergency plans. Changes to either the Security or Emergency plans are governed in accordance with the criteria in 10CFR50.54(p) and (q) respectively. The Radiological Effluent Technical Specifications are unchanged by the proposed Amendment and the change does not alter any assumptions previously made in evaluating the radiological consequences of an accident described in the UFSAR. Therefore, the proposed Amendment does not involve a significant increase in the probability or consequences of any accident previously evaluated.
- The possibility of a new or different kind of accident from any accident previously evaluated is not created. In matters related to nuclear safety, (1) all accidents are bound by previous analyses and (2) the Security and Emergency plans are unchanged by the proposed Amendment. The proposed change does not add or modify any equipment design nor does the proposed change involve any operational changes to any plant system or Limiting Condition for Operation (LCO). The absence of a hardware change or a change in programmatic controls ensures that the accident initiators are 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 (TS) because the results of the accident analyses which are documented in the UFSAR continue to bound operation under the proposed changes so that there is no safety margin reduction. Additionally, established activities and administrative practices will continue to be conducted in compliance with the Commission's regulations. The purpose of the proposed Amendment is to provide time-saving measures, if deemed necessary. Therefore, the proposed change does not involve a significant reduction in a margin of safety.

## CONCLUSION

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