

ATTACHMENT A

Revise the Technical Specification pages as follows:

Remove

4.3-1  
4.3-1a

Insert

4.3-1  
-

4.3

Reactor Coolant System

Applicability

Applies to surveillance of the reactor coolant system and its components.

Objective

To ensure operability of the reactor coolant system and its components.

Specifications:

4.3.1 Reactor Vessel Material Surveillance Testing

4.3.1.1 The reactor vessel material surveillance specimens shall be removed and examined to determine changes in their material properties, as required by Appendix H to 10 CFR Part 50.

4.3.2 Pressurizer

4.3.2.1 The pressurizer water level shall be verified to be within its limits at least once per 12 hours during power operation and hot shutdown.

## ATTACHMENT B

### INTRODUCTION

The proposed amendment revises Technical Specification (TS) 4.3.1.1 pursuant to guidance provided in Generic Letter (GL) 91-01, "Removal of the Schedule for the Withdrawal of Reactor Vessel Material Specimens from Technical Specifications", dated January 4, 1991. Further, TS 4.3.1.2 will be deleted since this specification is implicitly described in the proposed Specification 4.3.1.1.

The generic letter provides guidance for the preparation of a request for a license amendment to remove from the Technical Specifications (TS) the schedule for the withdrawal of reactor vessel material surveillance specimens. The control of changes to this schedule by way of a license amendment to modify the TS duplicates the requirements of Section II.B.3 of Appendix H to Part 50 of Title 10 of the Code of Federal Regulations (10 CFR). These requirements address the submittal of a proposed withdrawal schedule, as specified in 10 CFR 50.4, and Nuclear Regulatory Commission (NRC) approval before its implementation.

### DISCUSSION

Consistent with the generic letter, the reference to the Reactor Vessel Material Surveillance table, i.e., Ginna Technical Specification (TS) 4.3.1.1 and the corresponding table providing the schedule for the withdrawal of reactor vessel material surveillance specimens will be revised and removed respectively. Further, TS 4.3.1.2 will also be deleted. TS 4.3.1.2 requires a Summary Technical Report be written in accordance to Appendix H to 10CFR Part 50. Specification 4.3.1.2 is implicitly described in proposed Specification 4.3.1.1. Appendix H to 10CFR Part 50 requires a Summary Technical report to be submitted. Hence, existing Specification 4.3.1.2 duplicates requirements established by Appendix H.

The generic letter also requires assurance that the surveillance specimens are withdrawn at the proper time; therefore, the surveillance requirement section associated with the pressure and temperature limits, i.e., TS 4.3.1.1, will be revised to indicate that the specimens be removed and examined to determine changes in their material properties, as required by Appendix H.

### 10 CFR 50.92 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. Ginna's Reactor Vessel Material Surveillance Program ensures the availability of data to update the inservice operating temperature and pressure limits. The table identifying the schedule for withdrawal of the surveillance specimens will be removed;



however, proposed TS 4.3.1.1 will continue to require that specimens be removed and examined to determine changes in their material properties, as required by Appendix H to 10CFR50. Therefore, no reduction in the overall effectiveness of the program would result from implementation of the proposed change.

In conclusion, 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, all accidents are bound by previous analyses. The proposed changes do not add or modify any equipment design nor do the proposed changes involve any operational changes to any plant system or Limiting Condition for Operation (LCO). Proposed TS 4.3.1.1 will continue to require that specimens be removed and examined to determine changes in their material properties, as required by Appendix H to 10CFR50. The absence of a hardware change or a change to the requirement of the time to remove the capsules for re-evaluation ensures that the accident initiators are unaffected, so no unique accident probability is created.

Therefore, the proposed amendment does not create the possibility of a new or different kind of accident previously evaluated.

- 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. The removal of the schedule from the Technical Specifications for the withdrawal of reactor vessel material surveillance specimens will not result in any loss of regulatory control because changes to this schedule are controlled by the requirements of Appendix H to 10 CFR Part 50. In addition, to ensure that the surveillance specimens are withdrawn at a proper time, the surveillance requirement section related to the pressure and temperature limits, i.e., TS 4.3.1.1, will continue to indicate that the specimens be removed and examined to determine changes in their material properties, as required by Appendix H.

Therefore, the proposed changes do 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.