Attachment A

Revise the Technical Specification pages as follows:

Remove	Insert
3.6-4	3.6-4
3.6-6	3.6-6
3.6-7A	3.6-7A
3.6-10	3.6-10

TABLE 3.6-1

CONTAINMENT ISOLATION VALVES

PENT. NO.	IDENTIFICATION/DESCRIPTION	ISOLATION BOUNDARY	MAXIMUM ISOLATION TIME *(SEC)	ISOLATION BOUNDARY	MAXIMUM/ ISOLATION TIME *(SEC)
29	Fuel Transfer tube	flange	NA	(1)	NA
100	Charging line to "B" loop	CV 370B	NA	(2)	NA
101	SI Pump 1B discharge	CV 889B CV 870B	NA NA	(5) (5)	NA NA
102	Alternate charging to "A" cold leg	CV 383B	NA	(2)	NA
103	Construction Fire Service Water	welded flange	NA	MV 5129	NA
105	Containment Spray Pump 1A	CV 862A	NA	(3)	NA
106	"A" Reactor Coolant Pump (RCP) seal water inlet	CV 304A	NA	(2)	NA
107	Sump A discharge to Waste Holdup Tank	AOV 1728	60	AOV 1723	60
108	RCP seal water out and excess letdown to VCT	MOV 313	60	(4)	NA
109	Containment Spray Pump 1B	CV 862B	NA	(3)	NA
110	"B" RCP seal water inlet	CV 304B	NA	(2)	NA
110	SI test line	MV 879	NA	(5)	NA
111	RHR to "B" cold leg	MOV 720 (20)	NA	(6)	NA
112	Letdown to Non-regen. Heat Exchanger	AOV 371	60	AOV 200A AOV 200B AOV 202 RV 203	60 60 60 NA
113	SI Pump 1A discharge	CV 889A CV 870A	NA NA	(5) (5)	NA NA
120	Nitrogen to Accumulators	CV 8623	NA	AOV 846	60
120	Pressurizer Relief Tank (PRT) to Gas Analyzer (GA)	AOV 539	60	MV 546 (7)	NA

Proposed

PENT. NO.	IDENTIFICATION/DESCRIPTION	ISOLATION BOUNDARY	MAXIMUM ISOLATION TIME *(SEC)	ISOLATION BOUNDARY	MAXIMUM/ ISOLATION TIME *(SEC)
141	RHR-#1 pump suction from Sump B	MOV 850A (13)	NA	MOV 851A (13)	NA
142	RHR-#2 pump suction from Sump B	MOV 850B (13)	NA	MOV 851B (13)	NA
143	RCDT pump suction	AOV 1721	60	AOV 1003A AOV 1003B	60 60
201	Reactor Compart. Cooling Unit A & B	MV 4757 (16) MV 4636 (16)	NA NA	(11) (11)	NA NA
202	"B" Hydrogen recombiner (pilot & main)	MV 1076B MV 1084B	NA NA	SOV-IV-3B SOV-IV-5B	NA Normally Closed NA Normally Closed
203	Contain. Press. Transmitter PT-947 & 948	PT 947 PT 948	NA NA	MV 1819C MV 1819D	NA NA
203	Post accident air sample to "B" fan	MV 1563 MV 1566	NA NA	MV 1565 MV 1568	NA NA
204	Shutdown Purge Supply Duct [Purge Supply Duct]	flange (22) [AOV 5870]	NA [5]	AOV 5869 (22)	5
205	Hot leg loop sample	AOV 966C	60	MV 956D (14)	NA
206	Przr. liquid space sample	AOV 966B	60	MV 956E (14)	NA
206	"A" S/G sample	AOV 5735	60	(17)	NA
207	Przr. Steam space sample	AOV 966A	60	MV 956F	NA
207	"B" S/G sample	AOV 5736	60	(17)	NA
209	Reactor Compartment. Cooling Units A & B	MV 4758 (16) MV 4635 (16)	NA NA	(11) (11)	NA NA
210	Oxygen makeup to A & B recombiners	MV 1080A	NA	SOV IV-2A SOV IV-2B	NA Normally Closed NA Normally Closed

PENT. NO.	IDENTIFICATION/DESCRIPTION	ISOLATION BOUNDARY	MAXIMUM ISOLATION TIME *(SEC)	ISOLATION BOUNDARY	MAXIMUM/ ISOLATION TIME *(SEC)
315	Service Water from "C" fan cooler	MV 4643 (16)	NA	(11)	NA
316	Service Water to "B" fan cooler	MV 4628 (16)	NA	(11)	NA
317	Leakage test supply	flange	NA	MOV 7443	NA Normally Closed
318	Dead weight tester (decomissioned)	welded shut	NA	welded shut	NA
319	Service Water from "A" fan cooler	MV 4629 (16)	NA	(11)	NA
320	Service water to "C" fan cooler	MV 4647 (16)	NA	(11)	NA
321	A S/G Blowdown	AOV 5738	60	(17)	NA
322	B S/G Blowdown	AOV 5737	60	(17)	NA
323	Service Water from "D" fan cooler	MV 4644 (16)	NA	(11)	NA
324	Demineralized water to Containment	CV 8419	NA	AOV 8418	NA
332	Cont. Press. Trans. PT-944, 949 & 950	PT 944	NA	MV 1819G	NA
		PT 949	NA	MV 1819F	NA
		PT 950	NA	MV 1819E	NA
332	Leakage test and hydrogen monitor instrumentation lines	MV 7448	NA	cap	NA
		MV 7452	NA	cap	NA
		MV 7456	NA	cap	NA
		SOV 921	NA	(21)	NA
		SOV 922	NA	(21)	NA
		SOV 923	NA	(21)	NA
		SOV 924	NA	(21)	NA

(10) The pressure transmitter provides a boundary.

(11) Normally operating incoming and outgoing lines which are connected to closed systems inside containment and protected against missiles throughout their length, are provided with at least one manual isolation valve outside containment (FSAR 5.2.2 pg. 5.2.2-2).

(12) The single remotely controlled containment isolation valve is normally open and motor operated. The cooling water return line is not directly connected to the reactor coolant system and, should remain open while the coolant pump is running. A second automatic isolation barrier is provided by the component cooling water loop, a closed system. (FSAR 5.2.2 pg. 5.2.2-1a)

(13) See FSAR Table 5.2.2-1 and Figure 5.2.2-2. Sump lines are in operation and filled with fluid following an accident. Containment leakage testing is not required. The valves are subjected to RHR system hydrostatic test.

(14) Normally operating outgoing lines connected to the Reactor Coolant System are provided with at least one automatically operated trip valve and one manual isolation valve in series located outside the containment. In addition to the isolation valves, each line connected to the Reactor Coolant System is provided with a remote operated root valve located near its connection to the Reactor Coolant System. (FSAR 5.2.2 pg. 5.2.2-1)

(15) See FSAR Table 5.2.2-1 and Figure 5.2.2-17.

(16) The Service Water system operates at a pressure higher than the containment accident pressure and is missile protected inside containment. Therefore, these valves are used for flow control only and need not be leak tested.

(17) The S/G tubes and secondary side provide a closed system inside containment.

(18) Fire Service Water will be used only to fight fires inside containment. AOV 9227 is closed during power operation. A containment isolation signal to automatically close this valve is not required because a spurious signal during a fire may be hazardous to personnel and may impede fire suppression activities.

(19) See FSAR Table 5.2.2-1 and Figure 5.2.2-16.

(20) Containment leakage testing is not required per L. D. White, Jr. letter to Dennis L. Ziemann, USNRC dated September 21, 1978.

Attachment B

The purpose of this amendment is to revise several penetration listings in Technical Specification Table 3.6-1 to support an Integrated Leak Rate Test (ILRT) of the Ginna Station containment during the 1993 Refueling Outage. As a result of preparing for this test, RG&E determined that a discrepancy existed between the Technical Specifications and the NRC approved In-Service Test (IST) Program. Currently, Technical Specification Table 3.6-1 identifies two manual valves (820 and 204A) as containment isolation valves (CIVs) for Penetration 112. As part of the third 10 year IST program submittal for Ginna Station, RG&E identified that valves 820 and 204A would be removed from the IST program since their pressure and containment isolation functions were being performed by valves 200A, 200B, and 202 (Reference a). The NRC accepted this change by Reference (b). Therefore, RG&E requests that Table 3.6-1 be changed to replace valves 820 and 204A with AOVs 200A, 200B, and 202. In addition, relief valve 203, which is located between containment isolation valves 200A, 200B, 202 and 371 for this penetration, will be added to the table. All five valves are currently in the Ginna Station Appendix J testing program. This change will enable Penetration 112 to meet the explicit requirements of GDC 56. The current Table 3.6-1 Note 17 will also be deleted since it is no longer used.

Technical Specification Table 3.6-1 also identifies a manual valve in series with an air-operated valve as the CIVs for Penetrations 206, 207, 321, and 322. These penetrations contain the steam generator (S/G) blowdown and blowdown sample piping. RG&E requests that the manual valves be removed from Table 3.6-1 since the S/G tubes and secondary side provide one containment barrier. These penetrations will then be treated analogous to the main steam and feedwater lines which are of similar configuration. Table 3.6-1 Note 17 will then be revised and added to these four penetrations to reflect the use of the S/G tubes and secondary side as a containment boundary.

Table 3.6-1 Note 7 will also be deleted from these four penetrations. This note was originally applied to the S/G blowdown lines since they penetrate the missile shield inside containment in order to reach the S/Gs. However, the NRC has approved the use of "leak-before-break" (LBB) with respect to large diameter Reactor Coolant System piping at Ginna Station (Reference c). The use of LBB excludes the consideration of the dynamic effects associated with postulated pipe ruptures per 10 CFR 50, Appendix A, GDC 4. In addition, plant walkdowns and a review of Systematic Evaluation Program (SEP) Topic III-5.A, *Effects of Pipe Break on Structures, Systems, and Components Inside Containment*, (Reference d) confirms that even though these four lines penetrate the missile shield, they are not susceptible to any high energy line sources. This includes the affects of pipe whip and jet impingement. Therefore, the dynamic effects associated with any high energy line break inside containment does not require consideration with respect to the S/G closed system. The blowdown lines inside containment are also Seismic Category I and Safety Class 2. Consequently, the lines are considered missile protected based on their present location and have the necessary closed system design requirements.

RG&E will also eliminate 10 CFR 50 Appendix J testing related to the four AOVs for Penetrations 206, 207, 321, and 322 since there are not any requirements to perform this testing. Instead, RG&E will hydrostatically test these valves in accordance with the original requirements as outlined in the approved third 10 year IST program for Ginna Station (IWV-3421 through 3425) as a minimum. This will provide the necessary assurance that the valves will perform their required isolation function. These changes will be documented in the Ginna Station IST Program which will be submitted to the NRC following the conclusion of the 1993 Refueling Outage since RG&E expects to make several other unrelated IST Program changes at that time. These changes will not require NRC approval prior to implementation.

In accordance with 10 CFR 50.91, 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 previously evaluated; or

3. involve a significant reduction in a margin of safety.

These proposed changes do not increase the probability or consequences of a previously evaluated accident or create a new or different type of accident. Furthermore, there is no reduction in the margin of safety for any particular Technical Specification. The detailed changes are described in Attachment C.

Therefore, Rochester Gas and Electric submits that the issues associated with this Amendment request are outside the criteria of 10 CFR 50.91; and a no significant hazards finding is warranted.

References:

(a) Letter from R.C. Mecredy, RG&E, to A.R. Johnson, NRC, Subject: *Inservice Pump and Valve Testing Program*, dated May 23, 1989.

(b) Letter from A.R. Johnson, NRC, to R.C. Mecredy, RG&E, Subject: *R.E. Ginna Nuclear Power Plant IST Program for Pumps and Valves, 1990-1999 Third 10-Year Interval*, dated April 15, 1991.

(c) Letter from D. DiIanni, NRC, to R. Kober, RG&E, Subject: *Resolution of USI A-2, "Asymmetric LOCA Loads"*, dated September 9, 1986.

(d) NUREG-0821, *Integrated Plant Safety Assessment Systematic Evaluation Program, R.E. Ginna Nuclear Power Plant*, December 1982.

Attachment C Technical Specification Changes		
#	Changes	Effect
1.	Revise Table 3.6-1 Penetration 112 to delete valves 204A and 820 and add valves 200A, 200B, 202, and 203.	Penetration now satisfies explicit requirements of GDC 56.
2.	Revise Table 3.6-1 Penetration 206, 207, 321, and 322 to replace manual isolation valves with S/G closed system. Also delete Note 7 from these penetrations.	Penetration is now consistent with the main steam and feedwater penetrations. S/G closed system provides an acceptable containment barrier.
3.	Delete current Table 3.6-1 Note 17 and replace with new Note 17.	Current Note 17 is no longer used. New note provides information with respect to S/G closed system. No technical change.

TABLE 3.6-1

CONTAINMENT ISOLATION VALVES

PENT. NO.	IDENTIFICATION/DESCRIPTION	ISOLATION BOUNDARY	MAXIMUM ISOLATION TIME *(SEC)	ISOLATION BOUNDARY	MAXIMUM/ ISOLATION TIME *(SEC)
29	Fuel Transfer tube	flange	NA	(1)	NA
100	Charging line to "B" loop	CV 370B	NA	(2)	NA
101	SI Pump 1B discharge	CV 889B CV 870B	NA NA	(5) (5)	NA NA
102	Alternate charging to "A" cold leg	CV 383B	NA	(2)	NA
103	Construction Fire Service Water	welded flange	NA	MV 5129	NA
105	Containment Spray Pump 1A	CV 862A	NA	(3)	NA
106	"A" Reactor Coolant Pump (RCP) seal water inlet	CV 304A	NA	(2)	NA
107	Sump A discharge to Waste Holdup Tank	AOV 1728	60	AOV 1723	60
108	RCP seal water out and excess letdown to VCT	MOV 313	60	(4)	NA
109	Containment Spray Pump 1B	CV 862B	NA	(3)	NA
110	"B" RCP seal water inlet	CV 304B	NA	(2)	NA
110	SI test line	MV 879	NA	(5)	NA
111	RHR to "B" cold leg	MOV 720 (20)	NA	(6)	NA
112	Letdown to Non-regen. Heat Exchanger	AOV 371	60	~~MV 204A~~ AOV 200A ~~MV 820~~ AOV 200B ~~(14)(17)~~ AOV 202 RV 203	~~NA~~ 60 60 60 NA
113	SI Pump 1A discharge	CV 889A CV 870A	NA NA	(5) (5)	NA NA
120	Nitrogen to Accumulators	CV 8623	NA	AOV 846	60
120	Pressurizer Relief Tank (PRT) to Gas Analyzer (GA)	AOV 539	60	MV 546 (7)	NA

PENT. NO.	IDENTIFICATION/DESCRIPTION	ISOLATION BOUNDARY	MAXIMUM ISOLATION TIME *(SEC)	ISOLATION BOUNDARY	MAXIMUM/ ISOLATION TIME *(SEC)
141	RHR-#1 pump suction from Sump B	MOV 850A (13)	NA	MOV 851A (13)	NA
142	RHR-#2 pump suction from Sump B	MOV 850B (13)	NA	MOV 851B (13)	NA
143	RCDT pump suction	AOV 1721	60	AOV 1003A AOV 1003B	60 60
201	Reactor Compart. Cooling Unit A & B	MV 4757 (16) MV 4636 (16)	NA NA	(11) (11)	NA NA
202	"B" Hydrogen recombiner (pilot & main)	MV 1076B MV 1084B	NA NA	SOV-IV-3B SOV-IV-5B	NA Normally Closed NA Normally Closed
203	Contain. Press. Transmitter PT-947 & 948	PT 947 PT 948	NA NA	MV 1819C MV 1819D	NA NA
203	Post accident air sample to "B" fan	MV 1563 MV 1566	NA NA	MV 1565 MV 1568	NA NA
204	Shutdown Purge Supply Duct [Purge Supply Duct]	flange (22) [AOV 5870]	NA [5]	AOV 5869 (22)	5
205	Hot leg loop sample	AOV 966C	60	MV 956D (14)	NA
206	Przr. liquid space sample	AOV 966B	60	MV 956E (14)	NA
206	"A" S/G sample	AOV 5735	60	~~MV 5733 (7)~~(17)	NA
207	Przr. Steam space sample	AOV 966A	60	MV 956F	NA
207	"B" S/G sample	AOV 5736	60	~~MV 5734 (7)~~(17)	NA
209	Reactor Compartment. Cooling Units A & B	MV 4758 (16) MV 4635 (16)	NA NA	(11) (11)	NA NA
210	Oxygen makeup to A & B recombiners	MV 1080A	NA	SOV IV-2A SOV IV-2B	NA Normally Closed NA Normally Closed

PENT. NO.	IDENTIFICATION/DESCRIPTION	ISOLATION BOUNDARY	MAXIMUM ISOLATION TIME *(SEC)	ISOLATION BOUNDARY	MAXIMUM/ ISOLATION TIME *(SEC)
316	Service Water to "B" fan cooler	MV 4628 (16)	NA	(11)	NA
317	Leakage test supply	flange	NA	MOV 7443	NA Normally Closed
318	Dead weight tester (decomissioned)	welded shut	NA	welded shut	NA
319	Service Water from "A" fan cooler	MV 4629 (16)	NA	(11)	NA
320	Service water to "C" fan cooler	MV 4647 (16)	NA	(11)	NA
321	A S/G Blowdown	AOV 5738	60	~~MV 5701 (7)~~(17)	NA
322	B S/G Blowdown	AOV 5737	60	~~MV 5702 (7)~~(17)	NA
323	Service Water from "D" fan cooler	MV 4644 (16)	NA	(11)	NA
324	Demineralized water to Containment	CV 8419	NA	AOV 8418	NA
332	Cont. Press. Trans. PT-944, 949 & 950	PT 944	NA	MV 1819G	NA
		PT 949	NA	MV 1819F	NA
		PT 950	NA	MV 1819E	NA
332	Leakage test and hydrogen monitor instrumentation lines	MV 7448	NA	cap	NA
		MV 7452	NA	cap	NA
		MV 7456	NA	cap	NA
		SOV 921	NA	(21)	NA
		SOV 922	NA	(21)	NA
		SOV 923	NA	(21)	NA
		SOV 924	NA	(21)	NA

(10) The pressure transmitter provides a boundary.

(11) Normally operating incoming and outgoing lines which are connected to closed systems inside containment and protected against missiles throughout their length, are provided with at least one manual isolation valve outside containment (FSAR 5.2.2 pg. 5.2.2-2).

(12) The single remotely controlled containment isolation valve is normally open and motor operated. The cooling water return line is not directly connected to the reactor coolant system and, should remain open while the coolant pump is running. A second automatic isolation barrier is provided by the component cooling water loop, a closed system. (FSAR 5.2.2 pg. 5.2.2-1a)

(13) See FSAR Table 5.2.2-1 and Figure 5.2.2-2. Sump lines are in operation and filled with fluid following an accident. Containment leakage testing is not required. The valves are subjected to RHR system hydrostatic test.

(14) Normally operating outgoing lines connected to the Reactor Coolant System are provided with at least one automatically operated trip valve and one manual isolation valve in series located outside the containment. In addition to the isolation valves, each line connected to the Reactor Coolant System is provided with a remote operated root valve located near its connection to the Reactor Coolant System. (FSAR 5.2.2 pg. 5.2.2-1)

(15) See FSAR Table 5.2.2-1 and Figure 5.2.2-17.

(16) The Service Water system operates at a pressure higher than the containment accident pressure and is missile protected inside containment. Therefore, these valves are used for flow control only and need not be leak tested.

(17) ~~A manual valve outside containment in series with an automatic valve is provided for normally operating outgoing RCS lines (FSAR pg. 5.2.2-1).~~ The S/G tubes and secondary side provide a closed system inside containment.

(18) Fire Service Water will be used only to fight fires inside containment. AOV 9227 is closed during power operation. A containment isolation signal to automatically close this valve is not required because a spurious signal during a fire may be hazardous to personnel and may impede fire suppression activities.

(19) See FSAR Table 5.2.2-1 and Figure 5.2.2-16.

(20) Containment leakage testing is not required per L. D. White, Jr. letter to Dennis L. Ziemann, USNRC dated September 21, 1978.