

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)
)
Rochester Gas and Electric Corporation) Docket No. 50-244
(R.E. Ginna Nuclear Power Plant))

**APPLICATION FOR AMENDMENT
TO OPERATING LICENSE**

Pursuant to Section 50.90 of the regulations of the U.S. Nuclear Regulatory Commission (NRC), Rochester Gas and Electric Corporation (RG&E), holder of Facility Operating License No. DPR-18, hereby requests that the license, and the Technical Specifications set forth in Appendix A to that license, be amended. This request for change is to implement 10 CFR 50, Appendix J, Option B.

A description of the amendment request, necessary background information, justification of the requested changes, and no significant hazards and environmental considerations are provided in Attachment I. This evaluation demonstrates that the proposed changes do not involve a significant change in the types or a significant increase in the amounts of effluents or any change in the authorized power level of the facility. The proposed changes also do not involve a significant hazards consideration.

A marked up copy of the current Ginna Station Technical Specifications and license which show the requested changes is set forth in Attachment II. The necessary changes to the Ginna Station Improved Technical Specifications previously submitted in support of the conversion to improved standard technical specifications are provided in Attachment III.

WHEREFORE, Applicant respectfully requests that Facility Operating License No. DPR-18, and Attachment A to that license, be amended in the form attached hereto as Attachment II.

Rochester Gas and Electric Corporation

By Robert C. Mecredy
Robert C. Mecredy
Vice President
Nuclear Operations

Subscribed and sworn to before me
on this 27th day of November 1995.

Joanne S. Gorman
Notary Public

JOANNE S. GORMAN
Notary Public in the State of New York
Orleans County
Commission Expires Nov. 19 96

JOANNE S. GORMAN
Notary Public in the State of New York
Orleans County
Commission Expires Nov. 19

Attachment I

R.E. Ginna Nuclear Power Plant

License Amendment Request Implementation of 10 CFR 50, Appendix J, Option B

This attachment provides a description of the license amendment request (LAR) and the necessary justifications to support changes required to implement 10 CFR 50, Appendix J, Option B (hereto referred to as Option B). This attachment is divided into 5 sections as follows. Section A summarizes all changes to the current Ginna Station Technical Specifications and license required to implement Option B. Section B provides the justifications associated with these proposed changes. A no significant hazards consideration evaluation and environmental consideration of the requested changes to the Ginna Station Technical Specifications are provided in Sections C and D, respectively. Section E lists all references used in this attachment.

A. DESCRIPTION OF TECHNICAL SPECIFICATION CHANGES

This LAR proposes to revise the current Ginna Station Technical Specifications (CTS) and license to implement Option B as summarized below and shown in Attachment II. The change numbers listed below are also provided in the left-hand margin of the marked up CTS for cross-reference purposes (e.g., "Change 1" will be shown in the margin on page 5 of the Ginna Station license provided in Attachment II).

1. Ginna Station License

Item 2.D of the Ginna Station license contains the following four exemptions to 10 CFR 50, Appendix J, Option A, which are proposed to be removed:

- a. exemption from Section III.A.4(a) with respect to the maximum allowable leakage rate for reduced pressure tests;
- b. exemption from Section III.B.1 with respect to the acceptable technique for performing local Type B leakage rate tests;
- c. exemption from Section III.D.1 for scheduling of containment integrated leakage rate tests with respect to the 10 year inservice inspection (ISI); and
- d. exemption from Section III.D.2 with respect to the testing interval of containment airlocks.

2. Technical Specification 4.4.1.1

The definitions for P_t (containment reduced test pressure), L_t (containment reduced test pressure leakage rate), L_{am} (measured leakage rate from containment at P_a), and L_{tm} (measured leakage rate from containment at P_t) were deleted from technical specifications since Option B no longer allows the use of reduced pressure tests and these definitions are no longer required. Also, the definitions for P_a and L_a were revised consistent with the definitions provided in Option B. However, the actual values of P_a and L_a were not revised. These two definitions were then relocated to the Administrative Controls section.

3. Technical Specification 4.4.1.2

The integrated leakage rate testing (ILRT) requirement for visual inspections of the accessible interior and exterior surfaces of containment prior to the test and the requirement that containment isolation valves shall be closed without any preliminary exercising and adjustments were deleted from the technical specifications. These requirements are contained in Regulatory Guide (RG) 1.163 (Ref. 1), Section C.3, NEI 94-01 (Ref. 2), Section 9.2.1, and ANSI/ANS 56.8-1994 (Ref. 3) such that they do not need to be duplicated within technical specifications.

4. Technical Specification 4.4.1.3

The following changes were made to the requirements for conduct of ILRTs:

- a. Type A tests are now required to be performed in accordance with RG 1.163 (and ANSI/ANS 56.8-1994) instead of American National Standard N45.4-1972. This requirement was then relocated to the Administrative Controls section of technical specifications.
- b. The test accuracy requirements and termination criteria were deleted from technical specifications since these are contained in NEI 94-01, Section 9.2.3, and ANSI/ANS 56.8-1994.
- c. The minimum pressure for Type A reduced pressure tests was deleted from technical specifications since Option B no longer allows the use of reduced pressure tests.

5. Technical Specification 4.4.1.4

The acceptance criteria for Type A reduced pressure tests was deleted from technical specifications since Option B no longer allows the use of reduced pressure tests. Also, the acceptance criteria for the full pressure test was revised to state that following plant startup (i.e., after entering MODE 4), primary containment leakage rate acceptance criteria is $\leq 1.0 L_a$ (versus $\leq 0.75 L_a$) consistent with NEI 94-01, Section 9.2.5 and Reference 4. The acceptance criteria was then relocated to the Administrative Controls section of technical specifications.

6. Technical Specification 4.4.1.5

The test frequency for Type A tests was deleted from technical specifications since this information is contained in NEI 94-01, Sections 9.2.3 and 9.2.6 (for Type A tests), Section 10.2.1.2 (for Type B tests), and Section 10.2.2.1 (for air locks). Also, the requirement to retest following repair, replacement, or modification of a containment barrier was deleted from technical specifications since this is addressed in NEI 94-01, Section 9.2.4.

7. Technical Specification 4.4.1.6

The requirement for a summary report after each ILRT to be submitted to the NRC, and the minimum required information on valve closure malfunction or leakage, was deleted from technical specifications since the report is addressed by NEI 94-01, Section 12.1 and ANSI/ANS 56.8-1994.

8. Technical Specification 4.4.2.1

The requirements specifying the pressure at which local leak tests (i.e., Type B and C) are to be performed, and which penetrations are subjected to these local leak tests, were deleted from technical specifications since these requirements are contained in Option B, NEI 94-01, Section 6.0 and ANSI/ANS 56.8-1994.

9. Technical Specification 4.4.2.2

The Type B and C leakage rate acceptance criteria were relocated to the Administrative Controls section of technical specifications.

10. Technical Specification 4.4.2.3

The following changes were made:

- a. The corrective action requirements for failed Type B and C leakage tests were revised to require correction within 1 hour or the plant must shutdown. These requirements were then relocated to LCO 3.6.1.
- b. The Mini-Purge penetrations are now required to be declared inoperable with leakage $> 0.05 L_a$ and restored within 24 hours versus performing an engineering evaluation and developing corrective actions. This requirement was then relocated to LCO 3.6.3.
- c. Acceptance criteria for the containment air locks was also provided consistent with NEI 94-01 and Reference 4. These criteria were then relocated to the Administrative Controls section of technical specifications.

11. Technical Specification 4.4.2.4

The testing frequencies for Type B and C penetrations were deleted from technical specifications since this is addressed by RG 1.163 and NEI 94-01.

B. JUSTIFICATION OF CHANGES

This section provides the justification for all changes described in Section A above and shown in Attachment II. These justifications are mainly based on the new Option B and the supporting documentation. The justifications are organized based on whether the change is: more restrictive (M), less restrictive (L), administrative (A), or the requirement is removed or deleted (R). The justifications listed below are also referenced in the license or technical specification(s) which are affected (see Attachment II).

B.1 More Restrictive Changes

- M.1 Definitions and acceptance criteria for performing reduced pressure ILRTs were deleted from the CTS 4.4.1.1, 4.4.1.3.c, 4.4.1.4.a, and 4.4.1.4.b. Option B no longer allows the use of these reduced pressure tests since the testing interval is being extended to up to 10 years for ILRTs. Therefore, ILRTs which could be performed at ≥ 35 psig must now be performed at ≥ 57.6 psig and < 60 psig per ANSI/ANS 56.8-1994.

- M.2 CTS 4.4.2.3 was revised to provide acceptance criteria for containment air locks as required by NEI 94-01. These acceptance criteria are consistent with Reference 4 except for minor word changes.

B.2 Less Restrictive Changes

- L.1 CTS 4.4.1.3.b provides the requirements for verification of the accuracy of test instrumentation and calculational methods during the ILRT with respect to L_t . This was deleted since performing ILRTs at reduced pressure tests is no longer allowed by Option B. Instead, ANSI/ANS 56.8-1994 provides the necessary verification requirements. This is identified as being less restrictive since additional options are now provided with the CTS requirement being deleted. These new options have all been accepted for use by the NRC via RG 1.163. Therefore, this is considered an acceptable change.
- L.2 CTS 4.4.1.4.c was revised to state that the Type A leakage limit prior to entering MODE 4 following an ILRT is $\leq 0.75 L_a$, but this increases to $< 1.0 L_a$ following the MODE transition until the next ILRT is performed. This change is consistent with Reference 4 and provides margin for additional leakage that may occur between tests. The value of $1.0 L_a$ is used in the dose analyses such that this new leakage limit of $< 1.0 L_a$ remains within the accident analyses assumptions, and therefore, the 10 CFR 100 limits are maintained. Therefore, this change is considered acceptable.
- L.3 CTS 4.4.1.5.a.i was removed and revised to change the testing frequency requirements for ILRTs. The removal of the ILRT frequency is addressed in R.1 below. However, as part of removing these testing frequencies, NEI 94-01 allows the frequency to change from 3 times every 10 years (with no more than 4 years in-between tests) to once every 10 years provided that 2 successful tests have been performed. Also, this once every 10 years can be extended to 10 years, 15 months if required. This test frequency is considered acceptable since it is based on NRC and industry research which demonstrates that ILRTs only detect a small percentage of containment leakage such that there is only a marginal increase in risk associated with the increased testing interval (Ref. 5). Since Ginna Station has never observed an ILRT failure, the frequency change allowed by removing the test frequency requirement is considered acceptable.

- L.4 CTS 4.4.1.5.a.ii, 4.4.2.4.a, and 4.4.2.4.b were removed and revised to change the Type B and C testing frequencies. The removal of these testing frequencies is addressed by R.1 below. However, as part of removing these testing frequencies, NE 94-01 allows testing of Type B penetrations to be increased to once every 120 months (with an additional 24 months allowed) provided that 2 successful tests have been performed. Type C tests can be increased to once every 60 months provided that two successful tests have been performed. The revised testing frequency is consistent with RG 1.163 and NEI 94-01. Reference (4) states that changing these testing frequencies is expected to result in significantly reduced personnel exposures with no real increase in risk. Therefore, this change is considered acceptable.
- L.5 CTS 4.4.1.5.c and 4.4.1.5.d were removed and revised as follows (the removal is addressed in R.1 below):
- a. The requirement to submit a new test schedule to the NRC for review and approval following the failure of one ILRT was deleted and replaced with a requirement to perform a retest within 48 months per NEI 94-01. Tests must then continue at a frequency of once every 48 months (but no less than 24 months apart) until two consecutive successful tests are conducted. At that time, the test frequency can extend to once every 10 years. Requiring the first test within 48 months and the succeeding tests at a maximum 48 month intervals is consistent with CTS 4.4.1.5.a.i. Therefore, the only change being requested is to delete the requirement to submit a new testing schedule for NRC review and approval. Since the new testing interval has been generically approved by the NRC via RG 1.163, this change is considered acceptable. Also, the intention of a performance-based rule is to allow plants with good leakage testing results to extend surveillance intervals while plants with poor leakage testing results are to focus on the root cause, and therefore, resolve the problem. The proposed testing interval provides the licensee with the opportunity to correct the problem instead of focusing on the need for accelerated testing schedules, etc.
 - b. The requirement to perform a retest within 18 months or the next refueling outage, whichever comes first, following the failure of two consecutive tests was also deleted per NEI 94-01. Instead, leakage tests must continue on an interval of every 24 to 48 months until two tests are successfully performed. At that time, the testing frequency can extend up to 10 years. Therefore, the only change being requested is to eliminate the requirement to perform a retest within 18 months. This change is considered acceptable since the NRC has generically approved the new testing frequency via RG 1.163. Also, as discussed above, the intention of the performance-based rule is to focus on correcting the problem instead of requiring accelerated testing schedules, etc.

- L.6 CTS 4.4.1.6 was removed and revised to change the reporting requirements for ILRTs. The removal of the ILRT reporting requirements is addressed in R.1 below. However, as part of removing the report, NEI 94-01 no longer requires submittal of the report to the NRC. Instead, this report must be available on-site for NRC inspection. Requiring submittal of the ILRT report is an unnecessary burden on the licensee and the NRC since most industry conducted ILRTs (and all of those conducted at Ginna Station) have been successful. If an ILRT were to fail, then sufficient reporting requirements currently exist (i.e., 10 CFR 50.72 and 50.73). However, retaining the requirement to prepare the report but allowing it to remain on-site still provides the NRC the opportunity to review the report and documented test results with no reduction in safety. This approach has been generically approved by the NRC via RG 1.163. Therefore, this change is considered acceptable.
- L.7 CTS 4.4.2.1.a was removed and revised to change the pressure at which Type B and C tests are to be performed. The removal of these testing requirements is addressed by R.1 below. However, as part of removing this requirement, ANSI/ANS 56.8-1994 allows valves to be tested at $\geq 0.96 P_a$ but no greater than the containment design pressure. Since the value of P_a is equivalent to the design pressure of 60 psig, the Type B and C tests must be conducted between 57.6 and 60 psig. This small difference in pressure is considered acceptable due to the conservatism employed in calculating P_a . Also, the actual post-LOCA peak containment pressure is estimated to be ≤ 55 psig which remains bounded by the new leak test pressure definition of P_a . Therefore, this change is considered acceptable.
- L.8 CTS 4.4.2.4.c was removed and revised to change the testing frequency of containment air locks. The removal of these testing frequencies is addressed by R.1 below. However, as part of removing these requirements, NEI 94-01 allows the air lock testing frequencies to change as follows:
- a. The air locks must be tested once every 30 months (versus 6 months) by pressurizing the space between the air lock doors. This change is consistent with NEI 94-01 and provides sufficient testing requirements based on industry studies. Ginna Station has not observed air lock failures in the past which would negate these industry studies. Therefore, this change is considered acceptable.

- b. The air lock doors must be tested within 7 days of being opened in MODES 1, 2, 3, and 4 versus 48 hours. This time limit can extend up to 30 days if the door is being opened more frequently than once every 7 days. However, the doors must be tested prior to entering MODE 4 from MODE 5 whether the doors are used or not. These changes are consistent with NEI 94-01 and provide sufficient testing requirements as based on industry studies. Ginna Station has not observed air lock failures in the past which would negate these industry studies. Therefore, this change is considered acceptable.

B.3 Administrative Changes

- A.1 All retained Appendix J related testing requirements are being relocated to the Administrative Controls section of technical specifications. This provides equivalent control since any changes to the Administrative Controls section requires NRC review and approval. The location of this information in the Administrative Controls section is also consistent with NRC recommendations for implementation of Option B (Ref. 4).
- A.2 The definitions of P_a and L_a found in CTS 4.4.1.1 were revised to make the wording consistent with that provided in Option B and Reference 4. Since the actual values of these parameters remain the same, there is no difference with respect to performing the leakage tests (i.e., the leakage test pressure of P_a) or with respect to determining acceptable leakage and its impact on offsite dose calculations (i.e., L_a).
- A.3 CTS 4.4.1.3.a was revised to replace reference to American National Standard N45.4-1972 with ANSI/ANS 56.8-1994 (as endorsed by RG 1.163) for performance of ILRTs. Both standards are approved for use in the performance of ILRTs by the NRC. However, ANSI/ANS 56.8-1994 provides equivalent, and in some cases, more stringent requirements for performing ILRTs than N45.4 which was published in 1972. The use of ANSI/ANS 56.8-1994 is also required in order to implement Option B without NRC review of an alternate methodology.
- A.4 CTS 4.4.2.3.b was revised to require that penetrations which result in a failure to meet Type B and C leakage limits must be restored within 1 hour versus 48 hours before requiring a plant shutdown. The 1 hour time frame provides consistency with CTS 3.6.1 with respect to containment OPERABILITY and NUREG-1431. This requirement was then relocated to LCO 3.6.1. Also, CTS 4.4.2.3.c was revised to allow 24 hours to restore a Mini-Purge penetration with a high leakage rate versus performing an engineering evaluation and developing plans for corrective actions. This requirement now provides clear instructions to plant operators with a defined time period for restoring OPERABILITY. The actual leakage limit is to be relocated to the Administrative Controls section of technical specifications with the restoration requirement relocated to LCO 3.6.3.

A.5 The Ginna Station license was revised to remove four exemptions to 10 CFR 50, Appendix J, Option A. These exemptions are based on Reference (6) and are discussed in detail below:

- a. The exemption from Section III.A.4(a) with respect to the maximum allowable leakage rate for reduced pressure tests is no longer required since Option B does not allow the use of reduced pressure tests.
- b. The exemption from Section III.B.1 with respect to the acceptable technique for performing local Type B leakage rate tests is no longer required since ANSI/ANS 56.8-1994 provides the necessary allowances for the type of testing equipment to be used.
- c. The exemption from Section III.D.1 for scheduling of containment integrated leakage rate tests with respect to 10 year ISI intervals is no longer required since the Type A tests are only required once every 10 years such that coordination with the ISI program is no longer necessary. Also, Option B no longer requires this coordination between the Type A tests and the 10 year ISI.
- d. The exemption from Section III.D.2 with respect to the testing interval of containment airlocks is no longer required since NEI 94-01 provides testing intervals which are longer than those contained in the licensee as discussed in L.8 above.

B.4 Removed/Deleted

R.1 Numerous CTS requirements related to Appendix J testing were removed from CTS since they are contained in either RG 1.163, NEI-94-01, or ANSI/ANS 56.8-1994. Since a reference to RG 1.163 is being provided in the Administrative Controls section of technical specifications, and this regulatory guide specifically endorses NEI 94-01 and its use of ANSI/ANS 56.8-1994, there is no need to duplicate the same requirements within technical specifications. Any changes to NEI 94-01 and ANSI/ANS 56.8-1994 require NRC approval, with an associated revision to RG 1.163 documenting this approval, prior to implementation.

C. SIGNIFICANT HAZARDS CONSIDERATION EVALUATION

The proposed changes to the Ginna Station Technical Specifications as identified in Section A and justified in Section B have been evaluated with respect to 10 CFR 50.92(c) and shown to not involve a significant hazards consideration as described below. This evaluation is organized into the 4 categories as provided in Section B.

C.1 Evaluation of More Restrictive Changes

The more restrictive changes discussed in Section B.1 do not involve a significant hazards consideration as discussed below:

1. Operation of Ginna Station in accordance with the proposed changes does not involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed changes provide more stringent requirements for operation of the facility. These more stringent requirements do not result in operation that will increase the probability of initiating an analyzed event and do not alter assumptions relative to mitigation of an accident or transient event. The more restrictive requirements continue to ensure that process variables, structures, systems, and components are maintained consistent with the safety analyses and licensing basis. Therefore, this change does not involve a significant increase in the probability or consequences of an accident previously analyzed.
2. Operation of Ginna Station in accordance with the proposed changes does not create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed changes do not involve a physical alteration of the plant (i.e., no new or different type of equipment will be installed) or changes in the methods governing normal plant operation. The proposed changes do impose different requirements. However, these changes are consistent with assumptions made in the safety analysis and licensing basis. Thus, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.
3. Operation of Ginna Station in accordance with the proposed changes does not involve a significant reduction in a margin of safety. The imposition of more restrictive requirements either has no impact or increases the margin of plant safety. Each change in this category is, by definition, providing additional restrictions to enhance plant safety. The change maintains requirements within safety analyses and licensing bases. Therefore, this change does not involve a significant reduction in a margin of safety.

Based upon the above information, it has been determined that the proposed administrative changes to the Ginna Station Technical Specifications do not involve a significant increase in the probability or consequences of an accident previously evaluated, does not create the possibility of a new or different kind of accident previously evaluated, and does not involve a significant reduction in a margin of safety. Therefore, it is concluded that the proposed changes meet the requirements of 10 CFR 50.92(c) and do not involve a significant hazards consideration.

C.2 Evaluation of Less Restrictive Changes

The less restrictive changes discussed in Section B.2 do not involve a significant hazards consideration as discussed below:

1. Operation of Ginna Station in accordance with the proposed changes does not involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed changes are all consistent with NRC requirements and guidance for implementation of Option B. Based on industry and NRC evaluations performed in support of developing Option B, these changes potentially result in a minor increase in the consequences of an accident previously evaluated due to the increased testing intervals. However, the proposed changes do not result in an increase in the core damage frequency since the containment system is used for mitigation purposes only. The changes are also expected to result in increased attention on components with poor leakage test history as part of the performance-based nature of Option B such that the marginally increased consequences from the expanded testing intervals may be further reduced or negated. Therefore, these changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.
2. Operation of Ginna Station in accordance with the proposed changes does not create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed changes do not involve a physical alteration of the plant (i.e., no new or different type of equipment will be installed) nor alter the function of the containment system. The changes only provide for additional time between tests and revised acceptance and testing criteria for leakage tests which remain consistent with the accident analysis bases. Thus, these changes do not create the possibility of a new or different kind of accident from any previously evaluated.
3. Operation of Ginna Station in accordance with the proposed changes does not involve a significant reduction in a margin of safety. The proposed changes do not alter the manner in which safety limits, limiting safety system setpoints, or limiting conditions for operation are determined. Instead, the changes are expected to result in an increased focus on components demonstrating poor leakage test history without excessive testing of components which continue to demonstrate good test history. Therefore, these changes do not involve a significant reduction in a margin of safety.

Based upon the above, it has been determined that the proposed less restrictive changes to the Ginna Station Technical Specifications do not involve a significant increase in the probability or consequences of an accident previously evaluated, does not create the possibility of a new or different kind of accident previously evaluated, and does not involve a significant reduction in a margin of safety. Therefore, it is concluded that the proposed changes meet the requirements of 10 CFR 50.92(c) and do not involve a significant hazards consideration.

C.3 Evaluation of Administrative Changes

The administrative changes discussed in Section B.3 do not involve a significant hazards consideration as discussed below:

1. Operation of Ginna Station in accordance with the proposed changes does not involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed changes involve either: (1) the relocation of requirements within the Technical Specifications to support consolidation of similar requirements, (2) the reformatting or rewording of the existing Technical Specifications to provide consistency with 10 CFR 50, Appendix J, Option B or NRC implementing guidance, or (3) minor changes to the Technical Specifications such that the changes do not involve any technical nature. As such, these changes are administrative in nature and does not impact initiators or analyzed events or assumed mitigation of accident or transient events. Therefore, these changes do not involve a significant increase in the probability or consequences of an accident previously analyzed.
2. Operation of Ginna Station in accordance with the proposed changes does not create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed changes do not involve a physical alteration of the plant (i.e., no new or different type of equipment will be installed) or changes in the methods governing normal plant operation. The proposed changes will not impose any new or different requirements. Thus, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.
3. Operation of Ginna Station in accordance with the proposed changes does not involve a significant reduction in a margin of safety. The proposed changes will not reduce a margin of plant safety because the changes do not impact any safety analysis assumptions. These changes are administrative in nature. As such, no question of safety is involved, and the change does not involve a significant reduction in a margin of safety.

Based upon the above information, it has been determined that the proposed administrative changes to the Ginna Station Technical Specifications do not involve a significant increase in the probability or consequences of an accident previously evaluated, does not create the possibility of a new or different kind of accident previously evaluated, and does not involve a significant reduction in a margin of safety. Therefore, it is concluded that the proposed changes meet the requirements of 10 CFR 50.92(c) and do not involve a significant hazards consideration.

C.4 Evaluation of Removed or Deleted Requirements

The removed or deleted requirements discussed in Section B.4 do not involve a significant hazards consideration as discussed below:

1. Operation of Ginna Station in accordance with the proposed changes does not involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed changes only involve the removal or deletion of requirements which are duplicated in 10 CFR 50, Appendix J, Option B, Regulatory Guide 1.163 as referenced in the Technical Specifications, or NEI 94-01 and ANSI/ANS 56.8-1994 (as endorsed by RG 1.163). As such, this change is not technical in nature and does not impact initiators or analyzed events or assumed mitigation of accident or transient events. Therefore, this change does not involve a significant increase in the probability or consequences of an accident previously analyzed.
2. Operation of Ginna Station in accordance with the proposed changes does not create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed changes do not involve a physical alteration of the plant (i.e., no new or different type of equipment will be installed) or changes in the methods governing normal plant operation. The proposed changes will not impose any new or different requirements. Thus, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.
3. Operation of Ginna Station in accordance with the proposed changes does not involve a significant reduction in a margin of safety. The proposed changes will not reduce a margin of plant safety because the deleted requirements are still retained in other regulatory documents that cannot be changed without prior NRC review and approval. As such, no question of safety is involved, and the change does not involve a significant reduction in a margin of safety.

Based upon the above information, it has been determined that the proposed changes to the Ginna Station Technical Specifications do not involve a significant increase in the probability or consequences of an accident previously evaluated, does not create the possibility of a new or different kind of accident previously evaluated, and does not involve a significant reduction in a margin of safety. Therefore, it is concluded that the proposed changes meet the requirements of 10 CFR 50.92(c) and do not involve a significant hazards consideration.

D. ENVIRONMENTAL CONSIDERATION

RG&E has evaluated the proposed changes and determined that:

1. The changes do not involve a significant hazards consideration as documented in Section C above;
2. The changes do not involve a significant change in the types or significant increase in the amounts of any effluents that may be released offsite since the leakage testing program for the containment and associated isolation boundaries is being revised to support performance-based testing frequencies and activities which provides for increased attention on those components which demonstrate poor performance with no significant increase in risk; and
3. The changes do not involve a significant increase in individual or cumulative occupational radiation exposure since no new or different type of equipment are required to be installed as a result of this LAR, and the frequency of required testing which may result in radiation exposure is expected to be reduced.

Accordingly, the proposed changes meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), an environmental assessment of the proposed changes is not required.

E. REFERENCES

1. Regulatory Guide 1.163, *Performance-Based Containment Leak-Test Program*, September 1995.
2. NEI 94-01, *Industry Guideline for Implementing Performance-Based Option of 10 CFR 50 Appendix J*, Revision 0, July 26, 1995.
3. ANSI/ANS 56.8-1994, *Containment System Leakage Testing Requirements*.

4. Letter from C.I. Grimes, NRC, to D.J. Modeen, NEI, *Implementation of 10 CFR 50, Appendix J*, dated November 2, 1995.
5. Federal Register, Volume 60, Number 186, pages 49495 to 49505.
6. Letter from D.L. Ziemann, NRC, to L.D. White, Jr., RG&E, *Amendment No. 17 to Provisional Operating License No. DPR-18*, dated March 28, 1978.