

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 Technical Specifications set forth in Appendix A to that license, be amended. This request for change is to incorporate reference to the methodology for determining Low Temperature Overpressure Protection (LTOP) limits into the Administrative Controls section for the Reactor Coolant System (RCS) Pressure and Temperature Limits Report (PTLR).

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.

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A marked up copy of the Ginna Station Technical Specifications which show the requested changes is set forth in Attachment II. The proposed revised technical specifications are provided in Attachment III. An evaluation of the LTOP limits using the proposed methodology is provided in Attachment IV.

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 III.

Rochester Gas and Electric Corporation

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

Subscribed and sworn to before me
on this 9th day of February 1996.

Joanne S. Gorman
Notary Public

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

1. The first step is to identify the problem or question that needs to be answered. This involves understanding the context and the specific requirements of the task.

Attachment I

R.E. Ginna Nuclear Power Plant

License Amendment Request

Methodology for Low Temperature Overpressure Protection (LTOP) Limits

This attachment provides a description of the license amendment request (LAR) and the necessary justifications to support incorporation of the methodology for determining LTOP limits into the Administrative Controls section for the Reactor Coolant System (RCS) Pressure and Temperature Limits Report (PTLR). This attachment is divided into six sections as follows. Section A summarizes all changes to the Ginna Station Technical Specifications while Section B provides the background and history associated with the changes being requested. Section C 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 D and E, respectively. Section F lists all references used in this attachment.

A. DESCRIPTION OF TECHNICAL SPECIFICATION CHANGES

This LAR proposes to revise the Ginna Station Technical Specifications to incorporate reference to the methodology for determining LTOP setpoints. The change is summarized below and shown in Attachment II.

1. Administrative Controls 5.6.6

Item c will be revised to reference the methodology for determining LTOP limits and to delete reference to Amendment No. 48 with respect to LTOP limits.

B. BACKGROUND

During the conversion to improved standard technical specifications for Ginna Station, RG&E had proposed to relocate the LTOP and RCS temperature and pressure limits to the PTLR (Ref. 1). Associated with this change was the addition of a reference to the Administrative Controls section of technical specifications related to the PTLR documenting the methodology used for all changes to these limits. However, the proposed methodology would be "new" with respect to determination of both the LTOP and RCS temperature and pressure limits at Ginna Station. Due to time constraints, RG&E informed the NRC that use of this new methodology would be burdensome and instead, RG&E wished to retain the existing values. The NRC agreed with this concern and allowed the existing limits to be relocated to the PTLR but required changes to these limits to be reviewed and approved by the NRC as documented in Reference 2.

However, the determination that Ginna Station needed to retain the existing values was with respect to the RCS pressure and temperature limits that are included in the PTLR and not the LTOP limits. As such, this LAR requests that the LTOP methodology be reviewed and approved by the NRC staff such that it can be referenced within the Administrative Controls section of the technical specifications. Any changes to the RCS pressure and temperature limits included in the PTLR will still require NRC review and approval.

It should be noted that the LTOP methodology being proposed by RG&E had received initial NRC review since the methodology provided in Reference 1 incorporates all comments which RG&E had received to date. Attachment IV contains the evaluation of the LTOP limits at Ginna Station using this proposed methodology.

C. JUSTIFICATION OF CHANGES

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

C.1 Administrative

- A.1 Administrative Controls Section 5.6.6.c is revised to state that "the analytical methods used to determine the LTOP limits shall be those previously reviewed by the NRC" versus the "LTOP limits shall be those previously reviewed and approved by the NRC in Amendment No. 48." This change is administrative in nature since the LTOP limits were previously relocated from technical specifications to the PTLR. The only change being requested is that all future changes to these LTOP limits must be performed in accordance with NRC approved methodology instead of requiring a license amendment. The change is also consistent with NUREG-1431.

There are not any more restrictive (M), less restrictive (L), or relocated (R) changes associated with this LAR.

D. SIGNIFICANT HAZARDS CONSIDERATION EVALUATION

The proposed changes to the Ginna Station Technical Specifications as identified in Section A and justified in Section C have been evaluated with respect to 10 CFR 50.92(c) and shown to not involve a significant hazards consideration as described below. This section is organized based on Section C above.

D.1 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 only require that future LTOP limits be developed using NRC approved methodology as specified within the Administrative Controls section and do not involve any technical changes. As such, these changes are administrative in nature and do 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 other than requiring future evaluations of LTOP limits to be performed in accordance with NRC approved methodology. 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.

E. 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 D 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 no specifications related to offsite releases are affected; 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.

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.

F. REFERENCES

1. Letter from R.R. Mecredy, RG&E, to A.A. Johnson, NRC, Subject: *Technical Specifications Improvement Program, Reactor Coolant System (RCS) Pressure and Temperature Limits Report (PTLR)*, dated December 8, 1995.
2. Letter from L. B. Marsh, NRC, to R.R. Mecredy, RG&E, *R.E. Ginna - Acceptance for Referencing of Pressure Temperature Limits Report (TAC # M92320)*, dated December 26, 1995.