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 (the "Commission"), 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 in Technical Specifications is to revise Table 3.3.2-1, Function 5b, "Feedwater Isolation, SG Water Level - High" to raise the allowable value and trip setpoint. This change reflects design improvements in the replacement steam generators being installed at Ginna Station during the 1996 Refueling Outage.

A description of the amendment request, necessary background information, justification of the requested change, safety evaluation and no significant hazards and environmental considerations are provided in Attachment A. A marked up copy of the proposed Ginna Station Technical Specifications which shows the requested change is set for in Attachment B. The proposed revised Technical Specifications are provided in Attachment C.

The evaluation set forth in Attachment A demonstrates that the proposed change does 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 change also does not involve a significant hazards consideration.

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

Rochester Gas and Electric Corporation

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

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

# ATTACHMENT A

# R.E. GINNA NUCLEAR POWER PLANT

# LICENSE AMENDMENT REQUEST
# TECHNICAL SPECIFICATIONS TABLE 3.3.2-1

This attachment provides a description of the amendment request and necessary justification for the proposed changes. The attachment is divided into six sections as follows. Section A identifies all changes to the current Ginna Station Technical Specifications while Section B provides the background and history associated with the changes being requested. Section C provides detailed justification for the proposed changes. A safety evaluation, significant hazards consideration evaluation and environmental consideration of the requested changes are provided in Sections D, E, and F, respectively.

## A. DESCRIPTION OF AMENDMENT REQUEST

This License Amendment Request (LAR) proposes to revise Ginna Station Technical Specifications Table 3.3.2-1 as follows (see Attachment B and C):

1. Technical Specification Table 3.3.2-1, Function 5b.

   i. The allowable value is changed from ≤68% to ≤94%.

   ii. The trip setpoint value is changed from ≤67% to ≤85%.

## B. BACKGROUND

### 1. History

The Steam Generator Water Level - High feedwater isolation setpoint is designed to prevent excessive moisture carryover to the main steam system, which would cause excessive wear on the main turbine. Steam Generators separate water in two stages, a Primary stage and a secondary stage. Primary separators are located in the steam drum of the generator below the secondary separators, and generally work on the centrifugal principle. The high water level setpoint is chosen such that water in the downcomer is not above the top of these primary separators which would flood them and degrade their performance.

Ginna Station is planning to replace its steam generators during the 1996 Refueling Outage. The original steam generators are Westinghouse Model 44 steam generators. The primary separator flood point for these generators is at approximately 75% narrow range water level. Consequently, a setpoint sufficiently below this value to allow for instrument and process measurement uncertainty is chosen for the current setpoint value of 67% narrow range.

Replacement steam generators are being manufactured by Babcock and Wilcox International. The flood point for the primary separators on these generators is above 100% narrow range level. Consequently, new setpoints sufficiently below 100% to account for process measurement uncertainty are chosen for an allowable value (94%), and instrument uncertainty for a setpoint value (85%). This expanded range allows the operator more time to restore level to nominal conditions using controlled means prior to initiation of feedwater isolation.

### 2. Hardware Modifications

Prior to implementing this Technical Specification change the steam generators must be replaced. No other hardware changes are required.

## C. JUSTIFICATION

The design of the replacement steam generators is such that the primary steam separators are located at a higher elevation in the steam drum than in the existing steam generators. The bottom of the actual separator is approximately 14 inches above the upper narrow range level tap. Therefore, it is acceptable to operate with water levels above 100% narrow range level without degrading separator performance. Since water level above 100% cannot be monitored, 100% is chosen as the limit.

The UFSAR accident analyses that model this setpoint (Section 15.1.6, <u>Combined Steam-Generator Atmospheric Relief Valve and Feedwater Control Valve Failures</u>) currently use a value of 100% narrow range level. Therefore, the accident analysis is not affected by this proposed change.

Minimizing the challenges to this setpoint is beneficial. Fast swings in feedwater valve position caused by actuation/clearing of this setpoint make it difficult to control the feedwater system, level in the other steam generator, and primary side temperature. By raising this setpoint the number of challenges are reduced.

## D. SAFETY EVALUATION

The Steam Generator Water Level - High feedwater isolation function is designed to prevent excessive moisture carryover to the main steam system. The proposed setpoint change does not degrade the capability of the moisture separators and therefore this function is unchanged.

The UFSAR accident analyses that model this function (UFSAR Section 15.1.6) use a value of 100% narrow range level. Therefore the accident analysis is not affected by this proposed change.

Based on the above, the proposed amendment does not involve an unreviewed safety question and will not adversely affect or endanger the health and safety of the general public.

## E. SIGNIFICANT HAZARDS CONSIDERATION EVALUATION

The proposed changes to the Ginna Station Technical Specifications does 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 setpoint change does not degrade the performance of any plant equipment. Therefore, the probability of an accident is not increased. Since the revised trip setpoint and allowable value remain bounded by the accident analysis value of 100% steam generator narrow range level, the consequences of any accident are not adversely affected.

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 change does not involve a physical alteration to the plant (i.e., no new or different types of equipment will be installed) or changes in the methods governing normal plant operation. 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 revised setpoint and allowable value remain bounded by the accident analysis assumptions. The existing values are based on design considerations and not accident analysis parameters. The replacement steam generators are not restricted by the same design considerations with respect to the ESFAS Steam Generator Water Level - High function. Therefore, this change does not involve a 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.

## F. 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 E above;

2. The changes do not involve a change in the types or increase in the amounts of any effluents that may be released offsite since equipment performance is unchanged, and the accident analysis is unchanged.

3. The changes do not involve any 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, nor are any operating or testing practices to be changed.

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.