

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 revise the Required Actions for the auxiliary feedwater pump actuation on Steam Generator Level - Low Low logic to be consistent with those specified in NUREG-1431.

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. A copy of pages from NUREG-1431 which are relevant to this request is shown 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 29th day of October 1996.

**CHARLENE M. VERMEERSCH**  
Notary Public in the State of New York  
Wayne County  
My Commission Expires 8-7-97

Charlene M. Vermeersch  
Notary Public

CHARLES M. VERMILION  
County Clerk in the State of New York  
Westchester County  
My Commission Expires

## Attachment I

### R.E. Ginna Nuclear Power Plant

#### License Amendment Request

#### Revise Required Actions for Table 3.3.2-1, Function 6.c

This attachment provides a description of the license amendment request (LAR) and the necessary justifications to support a change to the Required Actions for inoperable channels of the auxiliary feedwater (AFW) pump actuation on Steam Generator (SG) Level - Low Low logic. 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 as summarized below and shown in Attachment II.

##### 1. Table 3.3.2-1

Function 6.c is revised to change the reference from Condition D to Condition F.

#### B. BACKGROUND

On February 13, 1996, the NRC issued Amendment No. 61 to the Ginna Station technical specifications (Ref. 1). This amendment replaced the existing Ginna Station technical specifications in their entirety with Improved Technical Specifications (ITS) that were based on NUREG-1431 (Ref. 2). Included with the conversion to ITS was implementation of WCAP-10271 (Ref. 3) which changed the required actions and surveillance frequencies for the Reactor Trip System (RTS) and Engineered Safety Features Actuation System (ESFAS). This change is primarily documented in Reference 4. The implementation of WCAP-10271 made the Ginna Station RTS and ESFAS requirements consistent with those contained in NUREG-1431.

Subsequent to the issuance of the ITS, RG&E discovered an error with respect to Table 3.3.2-1, Function 6.c related to the AFW pump actuation on SG Level - Low Low logic. This error requires restoration of an inoperable channel within 48 hours instead of placing the channel in its "tripped" state. This error has the potential to create a forced outage if an inoperable channel cannot be repaired within 48 hours when placing the channel in the tripped (or failed safe) condition is an acceptable alternative in standard technical specifications and WCAP-10271.

## 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). It is noted that there are only less restrictive changes associated with this LAR.

### C.1 Less Restrictive

1. The Required Actions for Table 3.3.2-1, Function 6.c is being revised to replace the current requirement to restore an inoperable channel to operable status within 48 hours with a requirement to place the inoperable channel in trip within 6 hours. This change is consistent with NUREG-1431 (see Attachment IV) and what RG&E originally proposed in Reference 4 (see pages 3.5-10 and 3.5-14 of Attachment II). The existing error was introduced due to the following reasons:
  - a. In the original RG&E submittal with respect to converting to the ITS (Ref. 5), RG&E proposed to implement WCAP-14333 (Ref. 6) with respect to the RTS and ESFAS chapters. This WCAP was (and currently still is) undergoing NRC review. As such, RG&E agreed to replace implementation of WCAP-14333 with WCAP-10271 which had already received NRC approval (Ref. 4). There are significant differences between these two WCAPs which were difficult to track.
  - b. Prior to Amendment No. 61, the Ginna Station Technical Specifications were "custom" and did not follow the standard technical specification formats. As such, translating the existing requirements, along with the changes provided by WCAP-10271, into the standard technical specification format introduced a large potential for error.

- c. The Ginna Station RTS and ESFAS chapters significantly differ from NUREG-1431 in format since RG&E elected to use a format more consistent with the other three owner's groups (e.g., BWRs). This change in format from NUREG-1431 also introduced a large potential for error.

Placing an inoperable SG Level - Low Low channel in trip instead of requiring restoration within 48 hours is consistent with all other ESFAS functions which utilize 2 of 3 (or 2 of 4) logic for actuation. Placing an inoperable channel in trip only reduces the required actuation to 1 of 2 (or 2 of 3). Requiring restoration within 48 hours is only used for those functions where placing the channel in trip results in an actuation. Since the AFW actuation on SG Level - Low Low has 3 channels per SG, of which 2 of the 3 channels are required for actuation, this change is acceptable.

There are not any administrative (A), more restrictive (M), 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 Less Restrictive Changes

The less restrictive changes discussed in Section C.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 with respect to the Required Actions for AFW actuation on SG Level - Low Low logic provide consistency with NUREG-1431 by requiring an inoperable channel to be placed in the tripped condition within 6 hours. The affected logic then requires 1 of 2 channels in order to actuate such that there is no impact on any 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 AFW actuation on SG Level - Low Low still remains capable of performing its function with an inoperable channel placed in the tripped configuration. These changes are also consistent with those provided in NUREG-1431. 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.

#### 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 A.R. Johnson, NRC, to R.C. Mecredy, RG&E, *Issuance of Amendment No. 61 to Facility Operating License No. DPR-18, R.E. Ginna Nuclear Power Plant*, dated February 13, 1996.
2. NUREG-1431, *Standard Technical Specifications, Westinghouse Plants*.
3. WCAP-10271, *Evaluation of Surveillance Frequencies and Out of Service Times for the Reactor Protection Instrumentation System*, May 1986.
4. Letter from R.C. Mecredy, RG&E, to A.R. Johnson, NRC, *Changes to Technical Specification Instrumentation Requirements, Conversion to Improved Technical Specifications*, August 31, 1995.
5. Letter from R.C. Mecredy, RG&E, to A.R. Johnson, NRC, *Application for Amendment to Facility Operating License, Conversion to Improved Standard Technical Specifications*, dated May 26, 1995.
6. WCAP-14333, *Probabilistic Risk Analysis of the RPS and ESFAS Test Times and Completion Times*, May 1995.