

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 Administrative Controls with respect to the Reactor Coolant System (RCS) Pressure and Temperature Limits Report (PTLR) to make the necessary changes in order place this document under licensee control, make several changes to the PTLR, and to revise the LTOP enable temperature methodology.

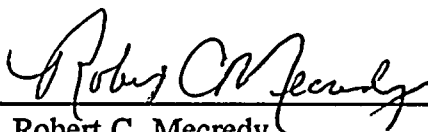
A description of the amendment request, necessary background information, justification of the requested changes, and a no significant hazards and environmental considerations are provided in Attachment I. This evaluation demonstrates that the proposed changes do not involve a significant change in the 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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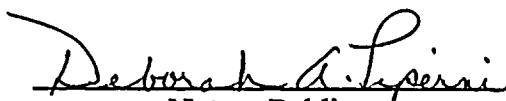
A marked up copy of the Ginna Station Technical Specifications which show the requested changes is set forth in Attachment II. The proposed revised technical specifications are provided in Attachment III. The revised PTLR is provided in Attachment IV. Attachment V contains a redlined version of the low temperature overpressure protection (LTOP) setpoint methodology with respect to the currently approved version. Attachment VI contains a final version of the LTOP setpoint methodology. Attachment VII contains the first use of the LTOP enable temperature methodology while Attachment VIII contains a copy of WCAP-14684 as referenced within the PTLR. Attachment IX contains responses to NRC questions concerning the Ginna Station LTOP analysis.

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
Vice President
Nuclear Operations

Subscribed and sworn to before me
on this 29th day of September 1997.


Notary Public

DEBORAH A. PIPERNI
Notary Public in the State of New York
ONTARIO COUNTY
Commission Expires Nov. 23, 1997

Attachment I

R.E. Ginna Nuclear Power Plant

License Amendment Request

Revision of Reactor Coolant System (RCS) Pressure and Temperature Limits Report (PTLR) Administrative Controls Requirements

This attachment provides a description of the license amendment request (LAR) and the necessary justifications to support a revision to the Ginna Station PTLR and related requirements contained within the Administrative Controls section of technical specifications. 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 reflect a new PTLR in the Administrative Controls section. The change is summarized below and shown in Attachment II.

1. Administrative Controls 5.6.6

Item c will be revised to replace the reference to the May 23, 1996 NRC letter with a new NRC reference that approves the first use of the PTLR methodology included as Attachment VI to this LAR. In addition, Reference 1 is revised to reference this LAR as the source for the low temperature overpressure protection (LTOP) methodology while Reference 2 is revised to reference the final NRC approved WCAP-14040-NP-A which is the basis for the new P/T curves. Reference 3 is no longer required and is therefore deleted. Finally, a typographical error in item d is corrected.

B. BACKGROUND

During the conversion to improved standard technical specifications (ISTS) for Ginna Station, RG&E proposed to relocate the LTOP and RCS pressure and temperature (P/T) 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 NRC approval of the methodology used in the PTLR. However, the only NRC approved methodology would be "new" with respect to determination of both the LTOP and RCS P/T 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.

Subsequent to the conversion to ISTS, the NRC completed its review of the latest reactor vessel capsule data and the associated impact on the pressurized thermal shock (PTS) evaluation for Ginna Station (Ref. 3). Incorporation of this information into the PTLR required a reassessment of the P/T curves and LTOP setpoints that are included in the PTLR. However, the fluence factor methodology used for the Ginna Station PTS evaluation was an earlier version than that required by WCAP-14040-NP-A (Ref. 4) which was to be the basis for the P/T methodology. Since an update of the associated documents could not be completed in the time frame required to support start-up from the 1996 refueling outage, the NRC approved a PTLR for use at Ginna Station until December 31, 1996 using an estimated fluence factor value (Ref. 5).

Subsequent to this, while attempting to close out the fluence factor methodologies, the NRC questioned RG&E's approach for determining LTOP enable temperature. Specifically, the NRC identified that the determination of the LTOP enable temperature required consideration of RCS liquid temperature measurement accuracy per the methodology currently specified in Specification 5.6.6. Upon further evaluation, RG&E agreed to address this concern by first submitting a relief request (Ref. 6) and then by requesting an exemption to regulations (Ref. 7). Subsequently, the NRC identified that the liquid temperature accuracy question should be instead addressed by a new LAR which updated the methodology in Specification 5.6.6 and incorporated an exemption to 10 CFR 50.60 (Ref. 8). To allow RG&E sufficient time to address this issue, the PTLR expiration date was changed to December 31, 1997 (Ref. 9).

The purpose of this LAR is to complete implementation of Generic Letter 96-03 for Ginna Station and to respond to the December 31, 1997 time limit on the existing PTLR. Generic Letter 96-03 requires that licensees reference the P/T and LTOP methodologies in the technical specifications and provide a proposed PTLR using the methodology for NRC review. Sections 1, 2, and 4 of WCAP-14040-NP-A (Ref. 4) have been generically approved for use by the NRC for P/T limits and is being proposed as the P/T limit methodology for Ginna Station. The current LTOP methodology for Ginna Station (Ref. 1) replaced that provided in Section 3 of WCAP-14040 due to RG&E specific issues and was previously reviewed by the NRC and found to be acceptable (Ref. 5). However, the LTOP enable temperature methodology is being revised to clarify the specific RCS temperature accuracy requirements and allow the use of ASME XI Code Case N-514 for temperature determination (Ref. 8). A redlined version of the LTOP methodology showing all changes from the previous NRC approved version is provided in Attachment V while a final version is provided in Attachment VI to this LAR.

Therefore, this LAR provides a proposed PTLR (and supporting documentation as provided in WCAP-14684) and includes a reference to WCAP-14040-NP-A and this LAR in the Administrative Controls as the basis for the methodology. It should be noted that even though the technical specifications do not require reactor vessel material information to be located within the PTLR, this information is provided consistent with Generic Letter 96-03. This includes a revised RT_{PTS} value based on the attached WCAP-14684. The revised RT_{PTS} value also includes changes made as a result of additional surveillance capsule chemistry analyses.

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

1. Administrative Controls Section 5.6.6.c is revised to: (1) replace reference to the May 23, 1996 submittal with a new reference that approves the first use of the PTLR methodology as contained in Attachment VI to this LAR; (2) update the Administrative Controls content consistent with GL 96-03; and, (3) update the references for PTLR methodology with respect to RCS P/T limits. Item (1) only changes the date of the NRC approval of the PTLR, including the PTLR methodology since Ginna Station currently has a NRC approved PTLR. Item (2) makes the Ginna Station Technical Specifications consistent with ISTS in order for the licensee to make future changes without NRC review and approval. Item (3) updates the PTLR methodology used for P/T limits to reference WCAP-14040-NP-A instead of referencing WCAP-14040 and the associated NRC approval letter (i.e., WCAP-14040-NP-A includes the NRC approval letter and all NRC required changes). These three changes are administrative in nature since the RCS P/T limits were previously relocated from technical specifications to the PTLR; only minor details are being clarified.
2. Administrative Controls Section 5.6.6.c.1 is revised to replace the previously approved LTOP methodology (Ref. 1) with that provided in Attachment VI to this LAR (Attachment V provides a "red-line" comparison to the previously approved methodology to show all differences). The only difference in the proposed new LTOP methodology from that approved previously is to provide additional clarifications consistent with NRC and RG&E communications and to allow the LTOP enable temperature and pressure limits to be determined using ASME Section XI Code Case N-514. This code case designates the allowable reactor coolant pressure boundary pressure during LTOP events to be 110% of that specified by 10 CFR 50, Appendix G. Use of this code case requires an exemption to 10 CFR 50.60 which was granted to RG&E in Reference 8. Therefore, this change incorporates the use of Code Case N-514 into the LTOP methodology specified within the Administrative Controls section of Technical Specifications consistent with Reference 8.
3. A typographical error in Administrative Controls Section 5.6.6.d is corrected to provide consistency 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 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 revise Administrative Controls Section 5.6.6.c to update the reference to the NRC's approval of the first use of the PTLR methodology, update the RCS P/T methodology to the final NRC approved version, allow use of ASME Code Case N-514 for LTOP enable temperature methodology, and to correct a typographical error. These changes complete implementation of Generic Letter 96-03 by referencing NRC approved methodology within the Administrative Controls. The updated RCS P/T methodology has been generically approved by the NRC while the use of ASME Code Case N-514 for LTOP enable temperature methodology was previously approved for use at Ginna Station by the NRC. 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 methodology have been shown to ensure that the P/T and LTOP limits in the PTLR continue to meet all necessary requirements for reactor vessel integrity. These changes are administrative in nature since the limits were previously relocated to the PTLR under a separate LAR. 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.C. Mecredy, RG&E, to A.R. 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.C. Mecredy, RG&E, Subject: *R.E. Ginna -Acceptance for Referencing of Pressure Temperature Limits Report (TAC No. M92320)*, dated December 26, 1995.
3. Letter from A.R. Johnson, NRC, to R.C. Mecredy, RG&E, Subject: *R.E. Ginna Nuclear Power Plant - Pressurized Thermal Shock Evaluation (TAC No. M93827)*, dated March 22, 1996.
4. WCAP-14040-NP-A, *Methodology Used to Develop Cold Overpressure Mitigating System Setpoints and RCS Heatup and Cooldown Limit Curves*, January 1996.
5. Letter from G.S. Vissing NRC, to R.C. Mecredy, RG&E, Subject: *Issuance of Amendment No. 64 to Facility Operating License No. DPR-18, R.E. Ginna Nuclear Power Plant (TAC No. M94770)*, dated May 23, 1996.
6. Letter from R.C. Mecredy, RG&E, to G.S. Vissing, NRC, Subject: *Request to Use ASME Code Case N-514 in the Determination of Low Temperature Overpressure Protection (LTOP) Enable Temperature*, dated December 18, 1996.
7. Letter from R.C. Mecredy, RG&E, to G.S. Vissing, NRC, Subject: *Request for Exemption to 10 CFR 50.60 to Use American Society of Mechanical Engineers (ASME) Code Case N-514 in the Determination of Low Temperature Overpressure Protection (LTOP) Enable Temperature*, dated February 10, 1997.
8. Letter from G.S. Vissing, NRC, to R.C. Mecredy, RG&E, Subject: *Exemption from the Requirements of 10 CFR Part 50.60, Acceptance Criteria for Fracture Prevention Measures for Lightwater Nuclear Power Reactors for Normal Operation - R.E. Ginna Nuclear Plant (TAC No. M98993)*, dated July 28, 1997.
9. Letter from G.S. Vissing, NRC, to R.C. Mecredy, RG&E, Subject: *R.E. Ginna -Acceptance of Request to Extend Time for Approval of Revision of Pressure and Temperature Limits Report (PTLR) (TAC No. M97313)*, dated December 10, 1996.

Attachment II

Marked Up Copy of R.E. Ginna Nuclear Power Plant
Technical Specifications

Included Pages:

5.0-22