

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 mode of applicability for the motor-driven auxiliary feedwater pump actuation on opening of the main feedwater pump breakers to correct an error introduced during Amendment No. 61.

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. The technical specification requirements for this function prior to Amendment No. 61 are 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

## Attachment I

### R.E. Ginna Nuclear Power Plant

#### License Amendment Request

#### Revise Mode of Applicability for Table 3.3.2-1, Function 6.f

This attachment provides a description of the license amendment request (LAR) and the necessary justifications to support a change to the mode of applicability for the motor-driven auxiliary feedwater (AFW) pump actuation on opening of the main feedwater (MFV) pump breakers. 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. LCO 3.3.2

Required Action C.1 is revised to only require entering Mode 2 instead of Mode 3 if Required Action B.1 is not completed.

##### 2. Table 3.3.2-1

Function 6.f is revised to change the mode of applicability from Modes 1 and 2 to only Mode 1.

## 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). Subsequent to the issuance of the ITS, RG&E discovered an error with respect to Table 3.3.2-1, Function 6.f related to the motor-driven AFW pump actuation on opening of the MFW pump breakers. This error required Function 6.f to be operable in Modes 1 and 2 versus the previous technical specifications which only required this Function in Mode 1. The addition of Mode 2 for this Function has required RG&E to install temporary jumpers to the AFW pump start logic since the MFW pumps are not typically in service under these conditions due to the low system heat loads. The use of these jumpers has resulted in two separate actuations of the AFW system as documented in References 3 and 4. Consequently, the purpose of this LAR is to revise the mode of applicability for Table 3.3.2-1, Function 6.f to be consistent with technical specification requirements prior to Amendment No. 61. This change also impacts the Required Actions for LCO 3.3.2 since in order to exit the mode of applicability for Function 6.f, the plant must only enter Mode 2 and not Mode 3.

## 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 mode of applicability for Table 3.3.2-1, Function 6.f is being revised to remove the requirement for Mode 2. This change is consistent with the Ginna Station technical specifications prior to Amendment No. 61 (see Attachment IV). Attachment IV shows that this Function was originally only required above 5% power which is equivalent to the definition of Mode 1 in the ITS (see Table 1.1-1 on page 1.1-7). While standard technical specifications require this Function in Modes 1 and 2 (Ref. 2), the NRC specifically evaluated this difference in Reference 5 and concluded that only requiring the Function above 5% power is appropriate for Ginna Station. This is due to the fact that below 5% power, AFW may be used to maintain steam generator level such that automatic actuation of AFW is not required (nor desired). The addition of Mode 2 in Amendment No. 61 was caused by use of the electronic version of NUREG-1431 in developing the ITS for Ginna Station. Since NUREG-1431 requires this Function in Modes 1 and 2, and RG&E failed to identify this difference and make the necessary corrections, Amendment No. 61 was issued with this additional requirement. The markups of the previous Ginna Station technical specifications included in Attachment B to Reference 6 do not show any intended change with respect to the mode of application for this Function during the conversion to the ITS. Therefore, this change was purely unintentional and should be corrected. There have been no subsequent plant modifications or changes to the accident analysis which would invalidate the previous NRC acceptance of only requiring this Function above 5% power.
2. LCO 3.3.2 Required Action C.1 is being revised to only require entry into Mode 2 if an inoperable channel of Table 3.3.2-1, Function 6.f is not restored to operable status within 48 hours per Required Action B.1. This change is necessary since the ITS are organized to only require exiting the mode of applicability if a given function is not operable. Since Table 3.3.2-1, Function 6.f is being revised to only apply in Mode 1, then the necessary required actions should only require exiting Mode 1 (i.e., entering Mode 2) if the function is not operable. There are no other functions in Table 3.3.2-1 which utilize Required Action C.1.

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 only correct an error which was introduced in Amendment No. 61 to the Ginna Station technical specifications. The changes revert the mode of applicability for the motor-driven AFW pump actuation on the opening of the MFW pump breakers to what existed previously. The change is essentially correction of a typographical error that was caused through use of the electronic version of NUREG-1431 in preparation of the Ginna Station ITS. There have been no subsequent plant modifications or changes to the accident analysis which would invalidate the previous NRC acceptance of only requiring this Function above 5% power. The accident analyses do not credit automatic initiation of AFW on MFW pump trip in MODE 2. As such, these changes 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 which existed prior to Amendment No. 61. 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 there have been no subsequent plant modifications or changes to the accident analysis which would invalidate the previous NRC acceptance of only requiring this Function above 5% power. 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. LER 96-008, *Main Feedwater Pump Breakers Open, Due to Low Seal Water Differential Pressure, Results in Automatic Start of Auxiliary Feedwater Pump*, dated August 6, 1996.

4. LER 96-011, *Improper Configuration of Circuit Breaker, Due to Undetected Internal Interference, Results in Automatic Start of Both Auxiliary Feedwater Pumps*, dated September 5, 1996.
5. Letter from D.M. Crutchfield, NRC, to J.E. Maier, RG&E, *Issuance of Amendment No. 42 to Provisional Operating License*, dated May 11, 1981 (see especially page 4 of safety evaluation, item 4).
6. 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 December 28, 1995.