

Dr. Robert C. Mecredy
Vice President, Nuclear Operations
Rochester Gas and Electric Corporation
89 East Avenue
Rochester, NY 14649

January 19, 2000

SUBJECT: R. E. GINNA NUCLEAR POWER PLANT - ISSUANCE OF AMENDMENT RE:
REACTOR COOLANT SYSTEM LEAKAGE DETECTION INSTRUMENTATION
(TAC NO. MA6013)

Dear Dr. Mecredy:

The Commission has issued the enclosed Amendment No76 to Facility Operating License No. DPR-18 for the R. E. Ginna Nuclear Power Plant. This amendment is in response to your application dated June 28, 1999.

This amendment revises the Ginna Station Improved Technical Specifications associated with the Reactor Coolant System Leakage Detection Instrumentation.

A copy of the related Safety Evaluation is also enclosed. A Notice of Issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,

/s/

Guy S. Vissing, Senior Project Manager, Section 1
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-244

Enclosures: 1. Amendment No76 to License No. DPR-18
2. Safety Evaluation

cc w/encls: See next page

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UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

January 19, 2000

Dr. Robert C. Mecredy
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Rochester Gas and Electric Corporation
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Sincerely,

A handwritten signature in cursive script, appearing to read "Guy S. Vissing".

Guy S. Vissing, Senior Project Manager, Section 1
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-244

Enclosures: 1. Amendment No76 to License No. DPR-18
2. Safety Evaluation

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

ROCHESTER GAS AND ELECTRIC CORPORATION

DOCKET NO. 50-244

R. E. GINNA NUCLEAR POWER PLANT

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 76
License No. DPR-18

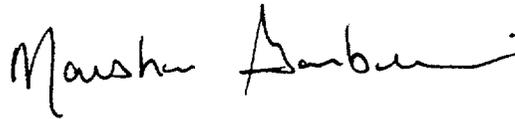
1. The Nuclear Regulatory Commission (the Commission or the NRC) has found that:
 - A. The application for amendment filed by the Rochester Gas and Electric Corporation (the licensee) dated June 28, 1999, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance: (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. DPR-18 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 76 , are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance and shall be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION



Marsha K. Gamberoni, Acting Chief, Section 1
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: January 19, 2000

ATTACHMENT TO LICENSE AMENDMENT NO. 76

FACILITY OPERATING LICENSE NO. DPR-18

DOCKET NO. 50-244

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove

3.4-38
3.4-39
3.4-40
3.4-41

Insert

3.4-38
3.4-39
3.4-40
3.4-41

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.15 RCS Leakage Detection Instrumentation

LCO 3.4.15 The following RCS leakage detection instrumentation shall be OPERABLE:

- a. One containment sump A monitor (level or pump actuation);
- b. Gaseous containment atmosphere radioactivity monitor; and
- c. Particulate containment atmosphere radioactivity monitor.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Required containment sump monitor inoperable.	-----NOTE----- LCO 3.0.4 is not applicable. -----	
	A.1.1 Perform SR 3.4.13.1.	Once per 24 hours
	<u>OR</u>	
	A.1.2 Verify containment air cooler condensate collection system is OPERABLE.	24 hours
<u>AND</u>		
A.2 Restore required containment sump monitor to OPERABLE status.	30 days	

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>B. Gaseous containment atmosphere radioactivity monitor inoperable.</p>	<p>-----NOTE----- LCO 3.0.4 is not applicable. -----</p> <p>B.1 Verify particulate containment atmosphere radioactivity monitor OPERABLE.</p>	<p>1 hour</p>
<p>C. Particulate containment atmosphere radioactivity monitor inoperable.</p> <p><u>OR</u></p> <p>Required Action and associated Completion Time of Condition B not met.</p>	<p>-----NOTE----- LCO 3.0.4 is not applicable. -----</p> <p>C.1 Analyze grab samples of the containment atmosphere.</p> <p><u>OR</u></p> <p>C.2 Perform SR 3.4.13.1.</p>	<p>Once within 12 hours and every 12 hours thereafter</p> <p>Once within 12 hours and every 12 hours thereafter</p>

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>D. Gaseous containment atmosphere radioactivity monitor inoperable.</p> <p><u>AND</u></p> <p>Particulate containment atmosphere radioactivity monitor inoperable.</p>	<p>-----NOTE----- LCO 3.0.4 is not applicable. -----</p> <p>D.1 Restore gaseous containment atmosphere radioactivity monitor to OPERABLE status.</p> <p><u>OR</u></p> <p>D.2 Restore particulate containment atmosphere radioactivity monitor to OPERABLE status.</p>	<p>30 days</p> <p>30 days</p>
<p>E. Required Action and associated Completion Time of Conditions A, C, or D not met.</p>	<p>E.1 Be in MODE 3.</p> <p><u>AND</u></p> <p>E.2 Be in MODE 5.</p>	<p>6 hours</p> <p>36 hours</p>
<p>F. All required monitors inoperable.</p>	<p>F.1 Enter LCO 3.0.3.</p>	<p>Immediately</p>

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.4.15.1	Perform CHANNEL CHECK of containment atmosphere radioactivity monitors.	12 hours
SR 3.4.15.2	Perform COT of containment atmosphere radioactivity monitors.	92 days
SR 3.4.15.3	Perform CHANNEL CALIBRATION of the required containment sump monitor.	24 months
SR 3.4.15.4	Perform CHANNEL CALIBRATION of containment atmosphere radioactivity monitors.	24 months



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO76 TO FACILITY OPERATING LICENSE NO. DPR-18

ROCHESTER GAS AND ELECTRIC CORPORATION

R. E. GINNA NUCLEAR POWER PLANT

DOCKET NO. 50-244

1.0 INTRODUCTION

By letter dated June 28, 1999 (Reference 1), the Rochester Gas and Electric Corporation (RG&E or the licensee) submitted a request for changes to the R. E. Ginna Nuclear Power Plant (Ginna) Technical Specifications (TSs). The proposed change to Technical Specification (TS) 3.4.15, Reactor Coolant System (RCS) Leakage Detection Instrumentation, would increase the compensatory actions that would be taken when the particulate containment atmosphere radioactivity monitor (R-11) is inoperable. Additional changes to TS 3.4.15 were also proposed. The license amendment was proposed as the result of a commitment that RG&E made as part of the RG&E application for leak-before-break (LBB) to portions of the residual heat removal (RHR) system.

2.0 BACKGROUND

In November 1997, the licensee requested that the NRC review and approve an application to remove consideration of the dynamic effects of postulated ruptures of portions of the Ginna residual heat removal RHR system piping from the licensing basis. The licensee submitted a LBB analysis for the subject portions of the RHR system piping. LBB evaluations developed using the analysis methodology contained in NUREG-1061, Volume 3, "Report of the U.S. Nuclear Regulatory Commission Piping Review Committee, Evaluation of Potential for Pipe Breaks," have been previously approved by the Commission as demonstration of an extremely low probability of piping system rupture. This methodology determines a piping flaw size that would provide early indication of a leak to allow operators to shutdown and depressurize the primary system before piping stresses would result in a catastrophic large break of the pipe. Having established the acceptable leakage flaw size from applying the appropriate factor of safety to the critical flaw size, the licensee's analysis then determined the leakage behavior of the postulated leakage flaw. The licensee's analysis determined that the acceptable leakage flaw at the hot leg provided the minimum amount of leakage of 4.7 gallons per minute (gpm), while the acceptable leakage flaw at the cold leg provided that leg's minimum leakage of 13.5 gpm. The licensee's analysis concluded that these leakage rates were detectable since the installed Ginna leakage detection system was capable of detecting 1 gpm of leakage (consistent with NRC Regulatory Guide (RG) 1.45, "Reactor Coolant Pressure Boundary Leakage Detection Systems," guidance). Therefore, the licensee concluded that the LBB behavior of this line had been demonstrated.

The NRC staff performed a separate analysis, comparing the critical flow size at the bounding location to the leakage flow size which provided 10 gpm of leakage under normal operating conditions. The 10 gpm value was established by noting that the demonstrated containment leakage detection system capability for Ginna was 1 gpm in the course of 1 hour (to comply with RG 1.45 criteria), and multiplying this 1 gpm value by a factor of 10 to account of thermohydraulic uncertainties as required in the guidance of NUREG-1061, Vol. 3. Based on these conditions, in order to conclude that LBB behavior was established for the system, the staff's evaluation would have had to find that a factor of 2 or greater existed between the leakage and critical flow sizes. The staff's initial evaluation showed that the factor between the leakage and critical flow sizes was considerably less than 2 in this case.

Based on the results of the staff's analysis, the licensee sought to address these margin issues by demonstrating a containment leakage detection system capability for Ginna of less than 1 gpm. The staff's calculations demonstrated that if the critical flow size was established (based on pipe failure under faulted loading conditions), and reduced by a factor of 0.50 (to account for the required factor of 2 between the critical and leakage flow size), this reverse-calculated "leakage flow size" would yield 2.75 gpm of leakage under normal operating conditions. Therefore, in order to maintain the factor of 10 on leakage required by NUREG-1061, Volume 3, the licensee sought to demonstrate that the Ginna containment leakage detection system was capable of detecting 0.275 gpm of leakage in the course of an hour.

By letter dated February 25, 1999 (Reference 2), the staff provided its review of LBB status of portions of the RHR system piping. In that review, the staff evaluated the capabilities of the containment air particulate monitor, R-11, and the containment gaseous monitor, R-12. Section 5.2.5 of the Ginna Final Safety Analysis Report states that the containment air particulate monitor is the most sensitive instrument available for detection of RCS leakage in containment. Assuming a complete dispersion of leaking radioactive solids consistent with very little or no fuel cladding leakage, R-11 is capable of detecting leaks as small as 0.013 gpm within 20 minutes. Even if only 10 percent of the particulate activity is actually dispersed, a leakage rate on the order of 0.13 gpm within 1 hour is well within the detectable range of R-11. Based on the review, the staff concluded in their safety evaluation the containment air particulate monitor at Ginna is capable of detecting less than 1 gpm within an hour as recommended in RG 1.45 (Reference 3) and for the purposes of LBB evaluation, R-11 can detect less than 0.25 gpm within 1 hour.

Ginna also has the containment gaseous monitor and containment sump level available for leakage detection. The containment gaseous monitor is much less sensitive than R-11, but can detect a leak of 2.0 to 10.0 gpm within 1 hour. R-12 is considered to be a backup to the particulate monitor. The containment sump level can measure approximately a 2.0 gpm leak within 1 hour. Operability of these three monitors is currently addressed in TS 3.4.15. Alternative means also exist to monitor RCS leakage inside containment. These include humidity detectors, air temperature and pressure monitoring, and condensate flow rate from the air coolers. These alternate methods are not covered by TSs.

Based on the importance of early RCS leakage detection to the LBB methodology, the licensee increased the frequency of the RCS water inventory balance when R-11 is unavailable. A requirement was added to the Ginna Technical Requirements Manual (TRM) to require either an RCS water inventory balance or analyses of containment atmosphere grab samples be

performed once within 12 hours and every 12 hours thereafter when R-11 is unavailable while in Modes 1, 2, 3 and 4. The licensee also committed to submit a license amendment request to revise Ginna's TSs to require either an RCS water inventory balance or analyses of containment atmosphere grab samples once within 12 hours and every 12 hours thereafter when monitor R-11 is unavailable while in Modes 1, 2, 3 and 4.

3.0 EVALUATION

Regulatory Guide (RG) 1.45 provides the staff's position on reactor coolant pressure boundary leakage detection systems. In particular, regulatory positions 3 and 9, below, are applicable to the RG&E request.

3. At least three separate detection methods should be employed and two of these methods should be (1) sump level and flow monitoring and (2) airborne particulate radioactivity monitoring. The third method may be selected from the following:

- a. Monitoring of condensate flow rate from air coolers,*
- b. Monitoring of airborne gaseous radioactivity.*

Humidity, temperature, or pressure monitoring of the containment atmosphere should be considered as alarms or indirect indication of leakage to the containment.

9. The technical specifications should include the limiting conditions for identified and unidentified leakage and address the availability of various type of instruments to assure adequate coverage at all times.

The current Ginna TS 3.4.15 Limiting Condition for Operation (LCO) requires two leakage detection systems to be operable. These include (1) one containment sump A monitor (level or pump actuation), and (2) one containment atmosphere radioactivity monitor (gaseous or particulate). The licensee has proposed to modify the LCO with regards to the containment atmosphere radioactivity monitors. Based on the importance of RCS leakage detection for the LBB methodology, the revised LCO would require one gaseous containment atmosphere radioactivity monitor and one particulate containment atmosphere radioactivity monitor to be operable. As such, the proposed LCO would read as follows:

The following RCS leakage detection instrumentation shall be OPERABLE:

- a. One containment sump A monitor (level or pump actuation);*
- b. Gaseous containment atmosphere radioactivity monitor; and*
- c. Particulate containment atmosphere radioactivity monitor.*

The proposed LCO meets the intent of the guidance of RG 1.45 regulatory position 3. The proposed LCO also clarifies that both the gaseous containment atmosphere radioactivity monitor and the particulate containment atmosphere radioactivity monitor are required to be operable in Modes 1, 2, 3 and 4. This is an important clarification for LBB purposes. Based on this information, the staff finds the proposed LCO acceptable.

The licensee proposed to replace Action Statements B, C, and D of TS 3.4.15. The proposed Action Statements are consistent with the licensee's commitment discussed in the LBB safety evaluation. The licensee also proposed an additional Action Statement which would address the gaseous containment atmosphere radioactivity monitor. The proposed Action Statements would read as follows:

- B. Gaseous containment atmosphere radioactivity monitor inoperable - verify particulate containment atmosphere radioactivity monitor operable within 1 hour.*
- C. Particulate containment atmosphere radioactivity monitor inoperable OR required action and associated completion time of condition B not met - analyze grab samples of containment atmosphere once per 12 hours and every 12 hours thereafter OR perform SR 3.4.13.1 once per 12 hours and every 12 hours thereafter.*
- D. Gaseous containment atmosphere radioactivity monitor inoperable AND particulate containment atmosphere radioactivity monitor inoperable - restore gaseous containment atmosphere radioactivity monitor to OPERABLE status in 30 days OR restore particulate containment atmosphere radioactivity monitor to OPERABLE status in 30 days.*

Surveillance Requirement (SR) 3.4.13.1 in Action Statement C requires the performance of an RCS water inventory balance. The staff has reviewed the proposed Action Statements and has confirmed that the Action Statements are consistent with the RG&E commitment. The current Action Statement A will remain unchanged. Action Statements E and F have editorial changes which are acceptable. With regards to proposed Action Statements B and D, the NRC staff concludes that the proposed Action Statements are appropriate to ensure the operability of the particulate containment atmosphere radioactivity monitor for LBB purposes. The NRC staff concludes that the revised Action Statements meets the guidance of RG 1.45 regulatory position 9. Based on this information, the staff finds the proposed Action Statements acceptable.

The licensee proposed to modify the current SR 3.4.15. The modification would delete the words "the required" and add an 's' to monitors for the containment atmosphere radioactivity monitor SRs. The following proposed SRs are consistent with NUREG-1433, Revision 1 (Reference 4):

- 1 Perform CHANNEL CHECK of containment atmosphere radioactivity monitors once per 12 hours.*
- 2 Perform COT of containment atmosphere radioactivity monitors once per 92 days.*
- 3 Perform CHANNEL CALIBRATION of the required containment sump monitor once per 24 months.*
- 4 Perform CHANNEL CALIBRATION of containment atmosphere radioactivity monitors once per 24 months.*

The proposed SRs, 1, 3 and 4, are consistent with NUREG-1433, Revision 1. The proposed SR 2 is consistent with the current Ginna TS 3.4.15. Based on this information, the staff concludes that the proposed SRs are acceptable.

The licensee has also proposed to replace the current TS Bases 3.4.15. The revised Bases would provide a detailed discussion of the leakage detection systems including background and applicable safety analyses. The proposed Bases also discusses the leakage detection capabilities of each system. The staff finds that the proposed Bases enhances the current TS Bases, and therefore, is acceptable.

In summation, the staff has reviewed RG&E's submittal and supporting documentation. The staff has concluded that the proposed TS and bases change is consistent with RG 1.45 and therefore is acceptable. The staff believes that there is reasonable assurance that plant operation in this manner poses no undue risk to the health and safety of the public.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the New York State official was notified of the proposed issuance of the amendment. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes surveillance requirements. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (64 FR 43778). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

7.0 REFERENCES

1. Mecredy, R. C., RG&E, to USNRC, "Application for Amendment to Facility Operating License Reactor Coolant System Leakage Detection Instrumentation Change (LCO 3.4.15) Rochester Gas and Electric Corporation R.E. Ginna Nuclear Power Plant Docket No. 50-244," June 28, 1999.

2. Vissing, G. S., USNRC, to Dr. Robert C. Mecredy, Rochester Gas and Electric on, "Staff Review of the Submittal By Rochester Gas and Electric Company to Apply Leak-Before-Break Status to Portions of the R.E. Ginna Nuclear Power Plant Residual Heat Removal System Piping (TAC No. MA0389)," February 25, 1999.
3. US Atomic Energy Commission Regulatory Guide 1.45, "Reactor Coolant Pressure Boundary Leakage Detection Systems," May 1973.
4. "Improved Standard Technical Specifications (STS) for General Electric (GE) BWR/4 Plants, Revision 1," USNRC, September 1992.

Principal Contributor: K. Kavanagh

Date: January 19, 2000