

Docket No. 50-244

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MARCH 31 1978

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Rochester Gas and Electric Corporation
ATTN: Mr. Leon D. White, Jr.
Vice President
Electric and Steam Production
89 East Avenue
Rochester, New York 14649

Gentlemen:

The Commission has issued the enclosed Amendment No. 18 to Provisional Operating License No. DPR-18 for the R. E. Ginna Nuclear Power Station. The amendment revises the license in response to your request dated June 3, 1977, and our letter dated March 9, 1977.

This amendment modifies the Technical Specifications to

- conform to the requirements of Regulatory Guide 1.8 (September 1975) regarding qualifications for Supervisor of Chemistry and Health Physics
- provide alternatives to assure proper radiation monitoring while individuals are in high radiation areas.

Copies of the related Safety Evaluation and the Notice of Issuance are also enclosed.

Sincerely,

LSI

Dennis L. Ziemann, Chief
Operating Reactors Branch #2
Division of Operating Reactors

Enclosures:

1. Amendment No. 18 to POL DPR-18
2. Safety Evaluation
3. Notice

JL
3/30/78

See Note to Barrett
Note, when written, will say this amendment is OK for issuance but there is a generic concern with language

Cheryl [Signature]
3/29/78

OFFICE →	DOR:ORB-2	DOR:ORB-2	OELD	DOR:ORB-2	
SURNAME →	RMDiggs	JShea:esp		DLZiemann	
DATE →	3/29/78	3/23/78	3/29/78	3/31/78	

Rochester Gas and Electric Corporation - 2 -

cc w/enclosures:

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Rochester Public Library
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DATE ➤						



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

ROCHESTER GAS AND ELECTRIC CORPORATION
DOCKET NO. 50-244
R. E. GINNA NUCLEAR POWER PLANT
AMENDMENT TO PROVISIONAL OPERATING LICENSE

Amendment No. 18
License No. DPR-18

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Rochester Gas and Electric Corporation (the licensee) dated June 3, 1977, 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 Provisional 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. 18, 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 the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Dennis L. Ziemann, Chief
Operating Reactors Branch #2
Division of Operating Reactors

Attachment:
Changes to the Technical
Specifications

Date of Issuance: March 31, 1978

ATTACHMENT TO LICENSE AMENDMENT NO. 18

PROVISIONAL OPERATING LICENSE NO. DPR-18

DOCKET NO. 50-244

Change the Technical Specifications contained in Appendix A of the above-indicated license as indicated below. The changed areas on the revised pages are reflected by a marginal line.

Remove

6.3-1
6.13-1

Insert

6.3-1
6.13-1
6.13-2

6.3 STATION STAFF QUALIFICATIONS

6.3.1 Each member of the facility shall meet or exceed the minimum qualifications of ANSI Standard N18.1-1971, "Selection and Training of Nuclear Power Plant Personnel", as supplemented by Regulatory Guide 1.8, September 1975, for comparable positions.

6.4 TRAINING

6.4.1 A retraining and replacement training program for the facility staff shall be maintained under the direction of the Training Coordinator and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix A of 10 CFR Part 55.

6.4.2 The training program shall meet or exceed NFPA No. 27, 1975 Section 40, except that (1) training for salvage operations need not be provided and (2) the Fire Brigade training sessions shall be held at least quarterly. Drills are considered to be training sessions.

6.13 HIGH RADIATION AREA

6.13.1

In lieu of the "control device" or "alarm signal" required by paragraph 20.203(c) (2) of 10 CFR Part 20:

- a. Each High Radiation Area in which the intensity of radiation is 1000 mrem/hr or less shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Health Physics Work Permit.* Any individual or group of individuals permitted to enter such areas shall be provided with one or more of the following:
 - (1) A radiation monitoring device which continuously indicates the radiation dose rate in the area.
 - (2) A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate levels in the area have been established and personnel have been made knowledgeable of them.
 - (3) A qualified health physicist (i.e., qualified in radiation protection procedures) with

* Health Physics personnel shall be exempt from the HPWP issuance requirement during the performance of their assigned radiation protection duties, providing they are following plant radiation protection procedures for entry into high radiation areas.

a radiation dose rate monitoring device who is responsible for providing positive control over the activities within the area and who will perform periodic radiation surveillance at the frequency specified in the HPWP. The surveillance frequency will be established by the Plant Health Physicist.

- b. Each High Radiation Area in which the intensity of radiation is greater than 1000 mrem/hr shall be subject to the provisions of 6.13.1 a. above, and in addition locked doors shall be provided to prevent unauthorized entry into these areas and the keys to these locked doors shall be maintained under the administrative control of the Shift Foreman on duty.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
SUPPORTING AMENDMENT NO. 18 TO PROVISIONAL OPERATING LICENSE NO. DPR-18
ROCHESTER GAS AND ELECTRIC CORPORATION
R. E. GINNA NUCLEAR POWER PLANT
DOCKET NO. 50-244

Introduction

By application dated June 3, 1977, Rochester Gas and Electric Corporation (RG&E) requested an amendment to Provisional Operating License No. DPR-18. The proposed Technical Specification changes relate to qualifications of the Radiation Protection supervisor in response to a letter from the NRC dated March 9, 1977, and requirements for personnel access to high radiation areas.

Discussion and Evaluation

Qualifications of the Radiation Protection Supervisor

Regulatory Guide 1.8, Revision 1, September 1975, Section D, states in part: "...if the RPM (Radiation Protection Manager) at an existing nuclear power station is reassigned or the incumbent is replaced the new manager should have qualifications equivalent to this guide." The Regulatory Requirements Review Committee, in its 27th meeting on May 2, 1975, endorsed this position and suggested that existing Technical Specifications in use at operating facilities be amended to reflect the applicability of these qualification guidelines.

As used in Regulatory Guide 1.8 for the bachelor's degree requirement, equivalency may be met with any one of the following: (a) four years of formal schooling in science or engineering, (b) four years of applied radiation protection experience at a nuclear facility, (c) four years of operational or technical experience/training in nuclear power, (d) any combination of the above totaling four years. It should be noted that the above requirement is in addition to the requirement for professional experience in applied radiation protection as specified in the Guide.

Because these proposed requirements are more stringent than the present Technical Specification requirements (ANSI N18.1 - 1971), and because adherence to these proposed requirements would assure that the position is and will be filled by a well-qualified and experienced professional, we have concluded that the proposed change is acceptable.

Personnel Access Into High Radiation Areas

The proposed change would allow the use of radiation dose integrating devices with an alarm feature, and/or direct observation of ongoing work by qualified health physics personnel as options for entry into high radiation areas in addition to the current technical specification which states that "any individual or group of individuals permitted to enter such areas shall be provided with a radiation monitoring device which continuously indicates the radiation dose rate in the area". The change is intended to provide equivalent exposure control, during certain operations, by use of electronic devices which alarm after pre-set doses have been reached, in lieu of administrative controls which are exercised by the use of dose rate measurements and commensurate "stay times" calculated to receive the same pre-set dose. Also, under conditions of a major shutdown, use of qualified health physics individuals to perform independent periodic radiation surveys when large numbers of jobs are going on in different high radiation areas would be more desirable than unqualified health physics individuals in each area performing this surveillance function in addition to their operational work.

An individual is considered to be qualified in radiation protection procedures when a licensee certifies that each designated individual is capable of successfully accomplishing the following activities as required by Federal regulations, license conditions, and facility procedures pertaining to radiation protection.

1. Conduct special and routine radiation, contamination and airborne radioactivity surveys and evaluate the results.
2. Establish protective barriers and post appropriate radiological signs.
3. Establish means of limiting exposure rates and accumulated radiation doses, including the use of protective clothing and respiratory protection equipment.
4. Perform operability checks of radiation monitors and survey meters.

5. Recommend appropriate immediate actions in the event of a radiological problem and perform necessary activities until the arrival of health physics personnel.
6. Conduct other routine radiological duties (e.g., TS surveillance items) as may be required on backshifts or weekends.

RG&E has also proposed that Health Physics personnel be exempt from the Radiation Work Permit (RWP) issuance requirement of the Technical Specifications which states that entrance into a high radiation area "shall be controlled by requiring issuance of an RWP ...". Health Physics department personnel are qualified to evaluate and set radiological standards for specific activities in specific areas. It is therefore inconsistent that they be controlled by an RWP.

With respect to the personnel alarm dosimeter proposal, we have evaluated RG&E's rationale for using these devices and their safety considerations with respect to radiation exposure control. Since personnel integrating alarm dosimeters are state-of-the-art instruments in radiation protection programs, and since their use is practicable and desirable in areas where high radiation levels may vary significantly within the area and dose rate meters may not be practicable for monitoring to as low as is reasonably achievable exposures because there is a continuing need for adjustment of stay time determinations, we find the proposed technical specification change acceptable. It should be noted that the change requires each individual wearing such devices to be made aware of the radiation levels prior to entry into the high radiation area of interest.

The alternative of using a qualified health physics individual, as described above, using a dose rate monitoring device to periodically monitor areas, at the frequency specified by the Plant Health Physicist, is also an acceptable method for ensuring control of radiation exposure to people in high radiation areas. By so doing, positive control over the activities of those people working in the area would be exercised by an independent person who would assure radiation protection management that the conditions of the RWP were being properly administered. We also agree that Health Physics personnel should be exempt from RWP issuance since these individuals are required to provide the radiation protection control techniques, as specified in the RWP, and therefore must enter high radiation areas to perform relevant radiological surveillance. Furthermore, they are required to follow plant radiation protection procedures prior to entry into high radiation areas which they have also written.

We conclude, therefore, that this proposed modification of the Technical Specifications is acceptable.

Environmental Consideration

We have determined that the amendment does not authorize a change in effluent types or total amounts nor an increase in power level and will not result in any significant environmental impact. Having made this determination, we have further concluded that the amendment involves an action which is insignificant from the standpoint of environmental impact and pursuant to 10 CFR §51.5(d)(4) that an environmental impact statement or negative declaration and environmental impact appraisal need not be prepared in connection with the issuance of this amendment.

Conclusion

We have concluded, based on the considerations discussed above, that: (1) because the amendment does not involve a significant increase in the probability or consequences of accidents previously considered and does not involve a significant decrease in a safety margin, the amendment does not involve a significant hazards consideration, (2) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (3) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

Date: March 31, 1978

UNITED STATES NUCLEAR REGULATORY COMMISSION

DOCKET NO. 50-244

ROCHESTER GAS AND ELECTRIC CORPORATION

NOTICE OF ISSUANCE OF AMENDMENT TO PROVISIONAL
OPERATING LICENSE

The U. S. Nuclear Regulatory Commission (the Commission) has issued Amendment No. 18 to Provisional Operating License No. DPR-18, issued to Rochester Gas and Electric Corporation (the licensee), which revised Technical Specifications for operation of the R. E. Ginna Plant (facility) located in Wayne County, New York. The amendment is effective as of its date of issuance.

The amendment modified the existing Ginna Technical Specifications to incorporate minimum qualifications for the Radiation Protection supervisor, in response to the NRC letter of March 9, 1977. The minimum qualifications are more stringent than those of the previous specification and are those set forth in Regulatory Guide 1.8 - "Personnel Selection and Training". The amendment also modified the Technical Specifications to provide alternatives to assure proper radiation monitoring while individuals are in high radiation areas.

The application for the amendment complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations. The Commission has made appropriate findings as required by the Act and the Commission's rules

and regulations in 10 CFR Chapter I, which are set forth in the license amendment. Prior public notice of this amendment was not required since the amendment does not involve a significant hazards consideration.

The Commission has determined that the issuance of this amendment will not result in any significant environmental impact and that pursuant to 10 CFR §51.5(d)(4) an environmental impact statement or negative declaration and environmental impact appraisal need not be prepared in connection with issuance of this amendment.

For further details with respect to this action, see (1) the application for amendment dated June 3, 1977, (2) Amendment No. 18 to License No. DPR-18, (3) the Commission's related Safety Evaluation, and (4) the Commission's letter to the licensee dated March 9, 1977. All of these items are available for public inspection at the Commission's Public Document Room, 1717 H Street, N. W., Washington, D. C. and at the Rochester Public Library, 115 South Avenue, Rochester, New York 14627. A copy of items (2), (3) and (4) may be obtained upon request addressed to the U. S. Nuclear Regulatory Commission, Washington, D. C. 20555, Attention: Director, Division of Operating Reactors.

Dated at Bethesda, Maryland, this 31st of March 1978.

FOR THE NUCLEAR REGULATORY COMMISSION



Dennis L. Ziemann, Chief
Operating Reactors Branch #2
Division of Operating Reactors