



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

July 31, 1984

Docket No. 50-244
LS05-84-07-030

Mr. Roger W. Kober, Vice President
Electric and Steam Production
Rochester Gas & Electric Corporation
89 East Avenue
Rochester, New York 14649

Dear Mr. Kober:

SUBJECT: PLANT STAFF WORKING HOURS AND REPORTING REQUIREMENTS FOR
SAFETY VALVE AND RELIEF VALVE FAILURES AND CHALLENGES

Re: R. E. Ginna Nuclear Power Plant

The Commission has issued the enclosed Amendment No. 62 to Provisional Operating License No. DPR-18 for the R.E. Ginna Nuclear Power Plant. This amendment is in response to your application dated April 15, 1983 as supplemented by your letter of August 12, 1983. We subsequently discussed it with members of your staff and mutually agreed to include, in the Technical Specifications (TS), your commitment to submit any changes in the overtime guidelines to the NRC for review.

The amendment approves TS changes that (1) limit the working hours of unit staff performing safety-related functions; and (2) provide for the reporting of safety and relief valve failures and challenges.

This amendment also corrects a typographical error on page 3.10-3 of the Technical Specifications as issued with Amendment No. 61.

A Notice of Consideration of Issuance of Amendment to License and Proposed No Significant Hazards Consideration Determination and Opportunity for Hearing related to the requested action was published in the Federal Register on September 21, 1983 (48 FR 43145). A second notice which included Rochester Gas and Electric Corporation letter of August 12, 1983 was published in the Federal Register on May 23, 1984 (49 FR 21836). The mutually agreed to revisions to your proposed Technical Specification changes were encompassed in this notice. No request for hearing and no comments were received.

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Mr. Roger W. Kober

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July 31, 1984

A copy of our related Safety Evaluation is also enclosed. This action will appear in the Commission's Monthly Notice publication in the Federal Register.

Sincerely,

Original signed by

Walter A. Paulson, Acting Chief
Operating Reactors Branch #5
Division of Licensing

Enclosures:

1. Amendment No. 62 to
License No. DPR-18
2. Safety Evaluation

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Mr. Roger W. Kober

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A copy of our related Safety Evaluation is also enclosed. This action will appear in the Commission's Monthly Notice publication in the Federal Register.

Sincerely,

Dennis M. Crutchfield, Chief
Operating Reactors Branch #5
Division of Licensing

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Mr. Roger W. Kober

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July 31, 1984

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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. 62
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) notarized April 13, 1983 as supplemented on August 12, 1983, 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. 62, 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

Walter A. Paulson

Walter A. Paulson, Acting Chief
Operating Reactors Branch #5
Division of Licensing

Attachment:
Changes to the Technical
Specifications

Date of Issuance: July 31, 1984

ATTACHMENT TO LICENSE AMENDMENT NO. 62
PROVISIONAL OPERATING LICENSE NO. DPR-18
DOCKET NO. 50-244

Revise Appendix A Technical Specifications by removing the pages identified below and inserting the enclosed pages. The revised pages contain the captioned amendment number and marginal lines which indicate the area of changes.

<u>REMOVE</u>	<u>INSERT</u>
3.10-3	3.10-3
6.2-1	6.2-1
6.9-3	6.9-3
--	6.9-3a*
6.9-6	6.9-6
--	6.9-6a*

* This page is included for pagination purposes only; there are no changes to the provisions contained thereon.

average power tilt ratio shall be determined once a day by at least one of the following means:

- a. Movable detectors
- b. Core-exit thermocouples

3.10.2.2

Power distribution limits are expressed as hot channel factors. At all times, except during low power physics tests the hot channel factors must meet the following limits:

$$\begin{aligned} F_Q(Z) &= (2.32/P)*K(Z) && \text{for } P \geq .5 \\ F_Q(Z) &= 4.64*K(Z) && \text{for } P \leq .5 \\ F_{\Delta H}^N &= 1.66 [1 + .3(1-P)] && \text{for } 0 \leq P \leq 1.00 \end{aligned}$$

Where P is the fraction of rated power at which the core is operating, K(Z) is the function given by Figure 3.10-3, and Z is the height in the core. The measured F_Q shall be increased by three percent to yield F_Q . If the measured F_Q or $F_{\Delta H}^N$ exceeds the limiting value, with due allowance for measurement error, the maximum allowable reactor power level and the Nuclear Overpower Trip set point shall be reduced one percent for each percent with $F_{\Delta H}^N$ or F_Q exceeds the limiting value, whichever is more restrictive. If the hot channel factors cannot be reduced below the limiting values within one day, the Overpower ΔT trip setpoint and the Overtemperature ΔT trip setpoint shall be similarly reduced.

3.10.2.3

Except for physics tests, if the quadrant to average power tilt ratio exceeds 1.02 but is less than 1.12, then within two hours:

- a. Correct the situation, or
- b. Determine by measurement the hot channel factors, and apply Specification 3.10.2.2, or.
- c. Limit power to 75% of rated power.

- c. At least two licensed Operators shall be present in the control room during reactor start-up, scheduled reactor shutdown and during recovery from reactor trips caused by transients or emergencies.
- d. All core alterations shall be directly supervised by either a licensed Senior Reactor Operator or Senior reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.
- e. An individual qualified in radiation protection procedures shall be on site when fuel is in the reactor.
- f. A Fire Brigade of 5 members shall be maintained on site at all times.* This excludes the two members of the minimum shift crew necessary for safe shutdown.
- g. Adequate shift coverage shall be maintained without routine heavy use of overtime. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions including senior reactor operators, reactor operators, health physicists, auxiliary operators, and key maintenance personnel. Changes to the guidelines for the administrative procedures shall be submitted to the NRC for review.

*Fire Brigade composition may be less than the minimum requirements for a period of time not to exceed 2 hours to accommodate unexpected absence of Fire Brigade members provided immediate action is taken to restore the Fire Brigade to the minimum requirements.

yield a calculated dose or dose commitment greater than those forming the basis of Specifications 4.12.2.2 or 3.16.1. The report shall also contain a discussion which identifies the causes of the unavailability of milk or leafy vegetable samples and identifies locations for obtaining replacement samples in accordance with Specification 3.16.1.4.

The radioactive effluent release report shall include a discussion which identifies the circumstances which prevent any required detection limits for effluent sample analyses from being met.

The radioactive effluent release reports shall include any changes made during the reporting period to the ODCM as specified in Section 6.15, and to the Process Control Program as specified in Section 6.16. The radioactive effluent release reports shall also include a discussion of any major changes to radioactive waste treatment systems in accordance with Specification 6.17.2.1.

6.9.1.5 Pressurizer Relief and Safety Valve Challenges

Challenges to the pressurizer power operated relief valves or safety valves shall be reported no less frequently than on an annual basis.

6.9.2 Reportable Occurrences

Reportable occurrences, including corrective actions and measures to prevent reoccurrence, shall be reported to the NRC. Supplemental reports may be required to fully describe final resolution of occurrence. In case of corrected or supplemental reports, a licensee event report shall be completed and reference shall be made to the original report date.

Note: This item is intended to provide for reporting of potentially generic problems.

(10) Failure of the pressurizer PORVs or safety valves.

b. Thirty Day Written Reports. The reportable occurrences discussed below shall be the subject of written reports to the Director of the appropriate Regional Office within thirty days of occurrence of the event. The written report shall include, as a minimum, a completed copy of a licensee event report form. Information provided on the licensee event report form shall be supplemented, as needed, by additional narrative material to provide complete explanation of the circumstances surrounding the event.

- (1) Reactor protection system or engineered safety feature instrument settings which are found to be less conservative than those established by the technical specifications but which do not prevent the fulfillment of the functional requirements of affected systems.
- (2) Conditions leading to operation in a degraded mode permitted by a limiting condition for operation or plant shutdown required by a limiting condition for operation.

Note: Routine surveillance testing, instrument calibration, or preventative maintenance which require system configurations as described in items 2.b(1) and 2.b(2) need not be reported except where test results themselves reveal a degraded mode as described above.

- (3) Observed inadequacies in the implementation of administrative or procedural controls which threaten to cause reduction of degree of redundancy provided in reactor protection systems or engineered safety feature systems.

- (4) Abnormal degradation of systems other than those specified in item 2.a(3) above designed to contain radioactive material resulting from the fission process.

Note: Sealed sources or calibration sources are not included under this item. Leakage of valve packing or gaskets within the limitations for identified leakage set forth in technical specifications need not be reported under this item.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
SUPPORTING AMENDMENT NO. 62 TO PROVISIONAL 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 December 29, 1982, Rochester Gas and Electric Corporation (the licensee) responded to Generic Letter 82-16 (NUREG-0737 Technical Specifications) which requested the licensee to conduct a Technical Specification (TS) review regarding a number of TMI Action Items. By letter dated April 15, 1983, as supplemented by letter dated August 12, 1983, Rochester Gas and Electric Corporation requested an amendment to the Appendix A Technical Specifications appended to License No. DPR-18 for the R.E. Ginna Nuclear Power Plant (Ginna). The amendment would include requirements for (1) the limit of overtime, and (2) reporting safety valve and relief valve failures and challenges.

This amendment also corrects a typographical error on page 3.10-3 of the Technical Specifications as issued with Amendment No. 61.

A Notice of Consideration of Issuance of Amendment to License and Proposed No Significant Hazards Consideration Determination and Opportunity for Hearing related to the requested action was published in the Federal Register on September 21, 1983 (48 FR 43145). A second notice which included the licensee letter of August 12, 1983 was published in the Federal Register on May 23, 1984 (49 FR 21836). A request for hearing and public comments were not received.

2.0 BACKGROUND

NUREG-0737 "Clarification of TMI Action Plan Requirements" identified those items for which Technical Specifications (TS) are required. Technical Specifications are required to provide necessary assurance that facility operation is maintained within the limits determined acceptable following implementation at each facility.

Generic Letter 82-16 identified a number of NUREG-0737 items which require new TS or TS changes. Included in the letter was guidance on the scope of specifications which the staff would find acceptable and samples in Standard Technical Specification format.

The licensees were requested to review their TS to determine if they were consistent with the guidance provided in GL 82-16. For those items where deviations or absence of a specification was identified, the licensees were requested to submit an application for a license amendment.

The licensee stated in a letter dated December 29, 1982 that of the 13 items identified in GL 82-16, only two were applicable to Ginna. Subsequently, the licensee requested by letter dated April 15, 1983, as supplemented August 12, 1983, changes to Section 6 of the TS for Ginna. The proposed changes would require that (1) administrative procedures be developed to limit the working hours of employees who perform safety-related functions and (2) challenges to the pressurizer power operated relief valves (PORV's) or safety valves (SV's) be reported at least annually.

The status of the 13 items identified in GL 82-16 is:

1. STA Training (I.A.1.13)

Amendment No. 42 dated May 11, 1981, incorporated TSs that specified the on duty requirements for Shift Technical Advisors (STAs). The licensee has deferred proposal of TS changes specifying training and qualification requirements for STAs pending decision on the requirements by the Commission.

2. Limit Overtime (I.A.1.3)

Covered in this Safety Evaluation.

3. Short Term Auxiliary Feedwater Evaluation (II.E.1.1)

Amendment No. 42 dated May 11, 1981, incorporated TSs that specified the means to maintain the AFW redundancy necessary to assure adequate AFW flow for normal, transient and accident conditions.

4. Safety Grade AFW System Initiation and Flow Indication (II.E.1.2)

Amendment No. 42 dated May 11, 1981, incorporated TS specifying the operability of automatic initiation system and flow indication. A safety evaluation issued August 18, 1982, noted that the Ginna auxiliary feedwater automatic initiation and flow indication systems, complied with the staff's long term safety grade requirements.

5. Dedicated Hydrogen Penetrations (II.E.4.1)

Not applicable at Ginna; the plant is equipped with internal recombiners.

6. Containment Pressure Setpoint (II.E.4.2.5)

Amendment No. 47 dated January 13, 1982, revised the containment pressure setpoint and found it to be consistent with the July 15, 1981 safety evaluation.

7. Containment Purge Valve (II.E.4.2.6)

The staff is currently reviewing this item as part of the overall containment purge review.

8. Radiation Signal on Purge Valves (II.E.4.2.7)

Amendment No. 42 dated May 11, 1981, incorporated a purge valve closure signal on sensing high radiation and specifies that if this automatic isolation function is lost, the operation may continue if the valves are kept closed.

9. Upgrade B&W AFW System (II.K.2.8)

Not applicable to Ginna.

10. Safety Grade Anticipatory Reactor Trip - B&W only (II.K.2.10)

Not applicable to Ginna.

11. Thermal Mechanical Report - B&W only

Not applicable to Ginna.

12. Reporting SV and RV Failures and Challenges (II.K.3.3)

Covered in this Safety Evaluation.

13. Anticipatory Trip on Turbine Trip (II.K.3.12)

An anticipatory trip on a turbine trip is included in the original Westinghouse design and is incorporated in the original TS.

3.0 DISCUSSION AND EVALUATION

3.1 Limit Overtime (I.A.1.3)

Generic Letter 82-16 transmitted to the licensee a revised version of the Commission's Policy Statement on nuclear power plant staff working hours. In its letter of April 15, 1983, the licensee proposed technical specifications to establish administrative procedures to limit working hours of the staff who perform safety-related functions and establish guidelines on the use of overtime. Further, by letter dated August 12, 1983, the licensee agreed to submit to the NRC any changes to the guidelines which may be made in the future. The additional commitment contained in the August 12, 1983 letter is included in the No Significant Hazards Consideration determination and Opportunity for Hearing published in the Federal Register on May 23, 1984 (49 FR 21836). The additional commitment makes the TS change more conservative than that originally submitted. Consequently, the licensee's TS change

request was modified, with the agreement of the licensee, to reflect the commitment. The staff has reviewed the licensee's proposed TS change. The proposed wording change does not directly reflect the guidelines established by the Commission Policy Statement, however, the licensee addresses all of the policy guidelines with only minor differences. The minor differences from policy guidelines are:

- exclusion of lunch relief-time from the 16 hour limitation
- limiting working hours to 72 hours in a pay week instead of any 7-day period to simplify accounting. A commitment has been made to audit records to ensure that this provision is not used to circumvent the intent of working no more than 72 hours in any 7-day period.

The staff concludes that the licensee's proposed overtime limitation policy meets the intent of the Commission policy and stated guidelines for controlling overtime hours. Since the licensee's August 12, 1983 letter also includes the commitment to submit proposed changes to the guidelines for their administrative procedures to the NRC, the staff finds the proposed TS change acceptable.

3.2 Reporting of Safety and Relief Valve Challenges and Failures (II.K.3.3)

By Generic Letter 82-16, the licensee was requested to formalize reporting requirements for safety and relief valve challenges and failures. The licensee has proposed a TS change which would require the submittal of an annual report on safety and relief valve challenges and prompt notification with written followup of safety and relief valve failures. The staff finds this change acceptable.

4.0 SUMMARY

The staff has reviewed the proposed changes and finds that they would acceptably satisfy the requirements of Generic Letter 82-16.

5.0 ENVIRONMENTAL CONSIDERATION

This amendment involves a change in the recordkeeping, reporting, and administrative procedures and requirements. Accordingly, this amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

6.0 CONCLUSION

The staff has further 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; and (2) 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.

7.0 ACKNOWLEDGEMENT

W. Lazarus, Region I, prepared this evaluation.

Dated: July 31, 1984