March 2, 1981

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Docket No. 50-244
LS05-81-03-007

RECEIVED MAR 12 1981 U.S. NUCLEAR REGULATORY COMMISSION

Mr. John E. Maier
Vice President
Electric and Steam Production
Rochester Gas and Electric Corporation
89 East Avenue
Rochester, New York 14649

Dear Mr. Maier:

SUBJECT: MINIMUM WATER LEVEL TO BE MAINTAINED ABOVE IRRADIATED FUEL ASSEMBLIES

The Commission has issued the enclosed Amendment No. 36 to Provisional Operating License No. DPR-18 for the R.E. Ginna Nuclear Power Plant. This amendment responds in part to your application notarized November 12, 1980 (submitted by letter dated November 17, 1980). Your application was in response to our letter dated August 15, 1980 to all Westinghouse pressurized water reactor licensees.

The amendment authorizes technical specifications regarding the minimum water level to be maintained above irradiated fuel assemblies during refueling operations.

Changes have been made to your submittal as mutually agreed upon during telephone conversations with your staff on January 30, 1981.

The remainder of your application notarized November 12, 1980, which concerns the decay heat removal system and follows the guidance of the NRC letter dated June 11, 1980, is being considered separately. We found it necessary to separate the two items because of the projected time for review of the decay heat removal system items and the need to incorporate the water level limits prior to your forthcoming refueling outage.

Copies of our Safety Evaluation and Notice of Issuance are also enclosed.

Sincerely,

Original signed by
Dennis M. Crutchfield

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

P

8103180255

G.K 2/26

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

cc w/enclosures:
See next page

OFFICE	ORB#5:DL	ORB#5:DL	C/ORB#5:DL	OELD	AD-SA:DL		
SURNAME	RSnaider:dn	HSmith	DCrutchfield	Ketcher	GLainas		
DATE	2/23/81	2/23/81	3/2/81	2/26/81	3/2/81		

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

March 2, 1981

Docket No. 50-244
LS05-81-03-007

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Vice President
Electric and Steam Production
Rochester Gas and Electric Corporation
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Dennis M. Crutchfield

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Operating Reactors Branch #5
Division of Licensing

Enclosures:
1. Amendment No. 36 to
   License No. DPR-18
2. Safety Evaluation
3. Notice

cc w/enclosures:
See next page

cc w/enclosures:
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Agency Building 2
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Albany, New York 12223

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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. 36
License No. DPR-18

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by Rochester Gas and Electric Company (the licensee) dated November 12, 1980 (transmitted by letter dated November 17, 1980) 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 by changing paragraph 2.C(2) of Provisional Operating License No. DPR-18 to read as follows:

   2.C(2) Technical Specifications

   The Technical Specifications contained in Appendix A, as revised through Amendment No. 36 , 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 issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Dennis M. Crutchfield

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

Attachment:
Changes to the Technical
Specifications

Date of Issuance: March 2, 1981

ATTACHMENT TO LICENSE AMENDMENT NO. 36

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 vertical lines which indicate the area of changes.

REMOVE	INSERT
ii	ii
3.8-2	3.8-2
-	3.8-2a
3.8-4	3.8-4
3.11-2	3.11-2
3.11-3	3.11-3
3.11-4	3.11-4
4.11-1	4.11-1
4.11-2	4.11-2
-	4.11-3

TABLE OF CONTENTS (cont.)

Amendment No. ~~17~~, ~~26~~, 36

least one source range netron flux monitor shall be in service.

d. At least one residual heat removal loop shall be in operation.*

e. Immediately before reactor vessel head removal and while loading and unloading fuel from the reactor, the minimum boron concentration of 2000 ppm shall be maintained in the primary coolant system and checked by sampling twice each shift.

f. Direct communication between the control room and the refueling cavity manipulator crane shall be available whenever changes in core geometry are taking place.

g. In addition to the requirements of paragraph 3.8.1.d, while in the refueling mode with less than 23 feet of water above the top of the reactor vessel flange, two residual heat removal loops shall be operable.*

h. During movement of fuel or control rods within the reactor vessel cavity, at least 23 feet of water shall be maintained over the top of the reactor vessel

---

* Either the normal or the emergency power source may be inoperable for each residual heat removal loop.

flange. If this condition is not met, all operations involving movement of fuel or control rods in the reactor vessel shall be suspended.

3.8.2 If any of the specified limiting conditions for refueling is not met, refueling of the reactor shall cease; work shall be initiated to correct the violated conditions so that the specified limits are met; no operations which may increase the reactivity of the core shall be made.

<u>Basis</u>:

The equipment and general procedures to be utilized during refueling are discussed in the FSAR. Detailed instructions, the above specified precautions, and the design of the fuel handling equipment incorporating built-in interlocks and safety features, provide assurance that no incident could occur during the refueling operations that would result in a hazard provided on the lifting hoist to prevent movement of more than one fuel assembly at a time. The spent fuel transfer mechanism can accommodate only one fuel assembly at a time. In addition interlocks on the auxiliary building crane will prevent the trolley from being moved over storage racks containing spent fuel.

The operability requirements for residual heat removal loops will ensure adequate heat removal while in the refueling mode. The requirement for 23 feet of water above the reactor vessel flange while handling fuel and fuel components in containment is consistent with the assumptions of the fuel handling accident analysis.

References:

(1) FSAR - Section 9.5.2

(2) Table 3.2.1-1

(3) FSAR - Section 9.3.1

e. Charcoal adsorbers shall be installed in the ventilation system exhaust from the spent fuel storage pit area and shall be operable.

3.11.2 Radiation levels in the spent fuel storage area shall be monitored continuously.

3.11.3 The trolley of the auxiliary building crane shall never be stationed or permitted to pass over storage racks containing spent fuel.

3.11.4 Fuel assemblies with less than 60 days since irradiation shall not be placed in storage positions with less spacing between them than that indicated in Figure 3.11-1 by the designation RDF.

3.11.5 The spent fuel pool temperature shall be limited to 150°F.

3.11.6 The spent fuel shipping cask shall not be carried by the auxiliary building crane, pending the evaluation of the spent fuel cask drop accident and the crane design by RG&E and NRC review and approval.

Basis:

Charcoal adsorbers will reduce significantly the consequences of a refueling accident which considers the clad failure of a single irradiated fuel assembly. Therefore, charcoal adsorbers should be employed whenever irradiated fuel is being handled. This requires that the ventilation system should be operating and drawing air through the adsorbers.

The desired air flow path, when handling irradiated fuel, is from the outside of the building into the operating floor area, toward the spent fuel storage pit, into the area exhaust ducts, through the adsorbers, and out through the ventilation system exhaust to the facility vent. Operation of a main auxiliary building exhaust fan assures that air discharged into the main ventilation system exhaust duct will go through a HEPA and be discharged to the facility vent. Operation of the exhaust fan for the spent fuel storage pit area causes air movement on the operating floor to be towards the pit. Proper operation of the fans and setting of dampers would result in a negative pressure on the operating floor which will cause air leakage to be into the building. Thus, the overall air flow is from the location of low activity (outside the building) to the area of highest activity (spent fuel storage pit). The exhaust air flow would be through a roughing filter and charcoal before being discharged from the facility. The roughing filter protects the adsorber from becoming fouled with dirt; the adsorber removes iodine, the isotope of highest radiological significance, resulting from a fuel handling accident. The effectiveness of charcoal for removing iodine is assured by having a high throughput and a high removal efficiency. The throughput is attained by operation of the exhaust fans. The high removal efficiency is attained by minimizing the amount of iodine that bypasses the charcoal and having charcoal with a high potential for removing the iodine that does pass through the charcoal.

The minimum spacing specified for fuel assemblies with less than 60 days decay is based on maintaining the potential release of fission products that could occur should an object fall on and damage stored fuel to less than that which could have occurred with fuel stored in the original fuel storage racks.

The spent fuel pool temperature is limited to 150°F because if the spent fuel pool cooling system is lost at that temperature, sufficient time (approximately 7 hours) is available to provide back-up cooling, assuming the maximum anticipated heat load (full core discharge & previously stored fuel), until a temperature of 180°F is reached, the temperature at which the structural integrity of the pool was analyzed and found acceptable.

<u>References</u>

(1) FSAR - Section 9.3-1

(2) ANS-5.1 (N 18.6), October 1973

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References

(1) FSAR - Section 9.3-1

(2) ANS-5.1 (N 18.6), October 1973

4.11 Refueling

Applicability

Applies to refueling and to fuel handling in the spent fuel pit.

Specification

4.11.1 Spent Fuel Pit Charcoal Adsorber System

4.11.1.1 Within 60 days prior to each major fuel handling* the spent fuel pit charcoal adsorber system shall have the following conditions demonstrated. After the conditions have been demonstrated, the occurrence of painting, fire or chemical release in any ventilation zone communicating with the spent fuel pit charcoal adsorber system shall require that the following conditions be redemonstrated before major fuel handling* may continue.

a. The total air flow rate from the charcoal adsorbers shall be at least 75% of that measured with a complete set of new adsorbers.

b. In-place Freon testing, under ambient conditions, shall show at least 99% removal.

c. The results of laboratory analysis on a carbon sample shall show 90% or greater radioactive methyl iodide removal when tested at at least 150°F and 95% RH and at 1.5 to 2.0 mg/m^3 loading with tagged CH_3I.

*Major fuel handling is considered as removal of 20% or more of the fuel assemblies from the reactor vessel.

d. Flow shall be maintained through the system using either the filter or bypass flow path for at least 15 minutes each month.

4.11.1.2 After each replacement of a charcoal filter drawer or after any structural maintenance on the charcoal housing for the spent fuel pit charcoal adsorber system, the condition of Specification 4.11.1.1.b shall be demonstrated for the affected portion of the system.

4.11.2 Residual Heat Removal and Coolant Circulation

When the water level above the top of reactor vessel flange is less than 23 feet, both RHR pumps shall be verified to be operable by performing the surveillance specified in the Inservice Pump and Valve Test Program prepared pursuant to 10 CFR 50.55a.

4.11.3 Water Level - Reactor Vessel

4.11.3.1 The water level in the reactor cavity shall be determined to be at least its minimum required depth within 2 hours prior to the start of and at least once per 24 hours thereafter during movement of fuel assemblies or control rods in containment.

Basis

The measurement of the air flow assures that air is being withdrawn from the spent fuel pit area and passed through the adsorbers. The flow is measured prior to employing the adsorbers to establish that there has been no gross change in performance since the system was last used. The Freon test provides a measure of the amount of leakage from around the charcoal adsorbent.

The ability of charcoal to adsorb iodine can deteriorate as the charcoal ages and weathers. Testing the capacity of the charcoal to adsorb iodine assures that an acceptable removal efficiency under operating conditions would be obtained. The difference between the test requirement of a removal efficiency of 90% for methyl iodine and the percentage assumed in the evaluation of the fuel handling accident provides adequate safety margin for degradation of the filter after the tests.

Retesting of the spent fuel pit charcoal adsorber system in the event of painting, fire, or chemical release is required only if the system is operating and is providing filtration for the area in which the painting, fire, or chemical release occurs.

Testing of the air filtration systems will be tested, to the extent it can be given the configuration of the systems, in accordance with ANSI N510-1975, "Testing of Nuclear Air-Cleaning Systems".

The operability requirements for residual heat removal loops will ensure adequate heat removal while in the refueling mode. The requirement for 23 feet of water above the reactor vessel flange while handling fuel and fuel components in containment is consistent with the assumptions of the fuel handling accident analysis.

<u>Reference</u>:

(1) Letter from E. J. Nelson, Rochester Gas and Electric Corporation to Dr. Peter A. Morris, U.S. Atomic Energy Commission, dated February 3, 1971

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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SUPPORTING AMENDMENT NO. 36 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 August 15, 1980, the NRC requested that all Westinghouse pressurized water reactor licensees review their technical specifications and procedures and make whatever revisions were necessary to assure that exposure of fuel assemblies and control rods cannot occur during transfer while the plant is undergoing refueling. Specifically, we requested that the Ginna Specifications be modified to require at least 23 feet of water over the top of the reactor pressure vessel flange during movement of fuel assemblies or control rods.

By letter dated September 26, 1980, Rochester Gas and Electric Corporation (RG&E)(the licensee) informed the NRC that the normal practice at the Ginna Plant had been to maintain 24.5 feet of water above the reactor vessel flange during refueling. However, such a requirement was not part of the Ginna Technical Specifications and a commitment to revise the specification was included in the September 26, 1980 letter. This commitment was fulfilled in the application notarized November 12, 1980 (submitted by letter dated November 17, 1980). Part of this submittal pertained to a request for technical specification changes regarding decay heat removal; these changes will be reviewed at a later date.

2.0 EVALUATION

The NRC concern originated from the fact that, from the vessel seated position, a fuel assembly may need to be lifted in excess of 23 feet in order to clear the vessel flange for movement to the fuel transfer system. Typically, there is an additional 12 to 18 inches of upward travel to ensure that the fuel assembly is fully withdrawn into the manipulator crane outer mask. Consequently, part of the fuel assembly could be exposed if the depth of water over the assemblies in the core did not exceed 23 feet.

In their letter of September 26, 1980, RG&E noted that Ginna normally maintains approximately 24.5 feet of water above the reactor vessel flange during refueling. Further, the Ginna manipulator crane lifts the bottom of the fuel assembly no more than one foot above the reactor vessel flange during the transfer, resulting in a water height of approximately 10 feet above the top of the fuel assemblies and control rods at their highest point during the transfer.

The NRC Technical Specification would require a minimum of 23 feet of water over the top of the reactor pressure vessel flange during movement of fuel assemblies or control rods. This requirement would assure that the minimum level of water over the fuel assemblies or control rods is approximately 33 feet, which is a sufficient depth to prevent inadvertent exposure of a fuel assembly or control rod during transfer.

RG&E has proposed technical specifications which would meet the intent of the requirements contained in our August 15, 1980 letter. We have reviewed their proposed specifications, as modified with mutual agreement during telephone discussions, and have found them to be acceptable.

Also, as part of the application, RG&E proposed changes to the Ginna Technical Specifications to bring portions of the specifications together in a more coherent manner. Because this was an administrative change only, we have found it to be acceptable.

3.0 ENVIRONMENTAL CONSIDERATION

We have determined that the proposed amendment does not authorize a change in effluent types, increase in total amounts of effluents, or an increase in power level, and will not result in any significant environmental impact. Having made this determination, we have 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.

4.0 CONCLUSION

We also conclude, 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 the health and safety of the public.

Date: March 2, 1981

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

The amendment incorporates technical specifications regarding minimum water level above the reactor vessel flange during refueling operations.

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 notarized November 12, 1980 (transmitted by letter dated November 17, 1980), (2) Amendment No. 36 to License No. DPR-18, and (3) the Commission's related Safety Evaluation. 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) and (3) may be obtained upon request addressed to the U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, Attention: Director, Division of Licensing.

Dated at Bethesda, Maryland, this second day of March, 1981.

FOR THE NUCLEAR REGULATORY COMMISSION

Dennis M. Crutchfield

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

(10-80)

U.S. NUCLEAR REGULATORY COMMISSION

REACTOR FACILITY FEE DETERMINATION

1. FEE FORM TYPE (Check one)
- [X] PRELIMINARY
- [X] FINAL
- [ ] AMENDED

INSTRUCTIONS. Fill-in items 1 through 14, as applicable, and send the original copy to the License Fee Management Branch.

2. DOCKET NUMBER(S): 50-244

3. ACCESSION NUMBER: 8011200268

4. LICENSEE: Rochester Gas

5. PLANT NAME AND UNIT(S): Ginna

6. DATE OF APPLICATION: 11/12/80 11/17/80 (Ltr.)

7. FEE REMITTED: [X] YES [ ] NO

8. LICENSEE FEE DETERMINATION

CLASS I	CLASS II	CLASS III	CLASS IV	CLASS V	CLASS VI	EXEMPT	NONE
		X					

9. SUBJECT: Minimum Water level to be maintained above irradiated fuel assemblies

10. TAC NUMBER ASSIGNED (If available): 42128

11. APPROVAL: [X] LETTER [ ] ORDER

DATE OF ISSUANCE: 3/2/81

AMENDMENT NUMBER(S): 36

12. NRC FEE DETERMINATION

- [X] The above application has been reviewed in accordance with Section 170.22 of Part 170 and is properly categorized.
- [ ] The above application has been reviewed in accordance with Section 170.22 of Part 170 and is incorrectly classified.

Fee should be class(es): ______

JUSTIFICATION FOR CLASSIFICATION OR RECLASSIFICATION

- [ ] This application is a Class ______ type of action and is exempt from fees because it is:
  - [ ] Filed by a nonprofit educational institution.
  - [ ] Filed by a Government agency and is not for a power reactor.
  - [ ] For a Class I, II, or III amendment which results from an NRC request dated ______ for the application and the amendment is to simplify or clarify License or Technical Specifications; has only minor safety significance; and is being issued for the convenience of NRC (*must meet all of the criteria*).
  - [ ] Other (*State reason therefor*)

10 2/9/81

13. SIGNATURE (*Branch Chief*): Snaider

DATE

14. FINAL CERTIFICATION. The preliminary fee determination has been reassessed and is hereby affirmed

SIGNATURE (*Project Manager or Branch Chief*): Dennis M. Crutchfield

DATE: 3/4/81

FOR LICENSE FEE MANAGEMENT BRANCH USE ONLY (*All others do not write below this line*)

The above exemption request has been reviewed and is hereby accepted as being exempt

SIGNATURE (*Chief, LFMB*)

DATE

DISTRIBUTION BY LFMB

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