

May 30, 1985

Docket No. 50-244

LS05-85-05-033

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: PROPOSED TECHNICAL SPECIFICATION CHANGE - DELETE REQUIREMENTS
FOR OPERATION OF CHARCOAL FILTER ABSORBER SYSTEM WHILE
MOVING FUEL IN SPENT FUEL POOL

Re: R. E. Ginna Nuclear Power Plant

The NRC staff has completed its review of the subject license amendment application dated March 13, 1985. We have determined that your application is not supported by a proper justification of your proposed alternative to the requirement of having the charcoal filters in operation while fuel is being moved in the auxiliary building. Accordingly, your application for amendment is denied. A copy of our related Safety Evaluation is enclosed. A copy of this Notice of Denial is being forwarded to the Federal Register.

Sincerely,

Original signed by:

John A. Zwolinski, Chief
Operating Reactors Branch No. 5
Division of Licensing

Enclosures:

1. Safety Evaluation
2. Notice of Denial

cc w/enclosures:
See next page

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Mr. Roger W. Kober
Rochester Gas and Electric Corporation

R. E. Ginna Nuclear Power Plant

cc
Harry H. Voigt, Esquire
LeBoeuf, Lamb, Leiby and MacRae
1333 New Hampshire Avenue, N.W.
Suite 1100
Washington, D.C. 20036

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New York State Department of Law
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

FACILITY OPERATING LICENSE NO. DPR-18

ROCHESTER GAS AND ELECTRIC CORPORATION

R. E. GINNA NUCLEAR POWER PLANT

DOCKET NO. 50-244

1.0 INTRODUCTION

On March 13, 1985, Rochester Gas and Electric Corporation submitted a Technical Specification amendment request that if granted would delete the requirement for operation of the charcoal filter system in the ventilation system exhaust from the spent fuel storage pit area during the handling of irradiated fuel assemblies in the auxiliary building.

2.0 EVALUATION

In the evaluation of SEP Topic XV-20, the limiting dose at the exclusion area boundary (EAB) was calculated for a fuel handling accident inside containment (Ref. 1). This evaluation concluded that the calculated dose for a release of unfiltered activity would be 96 rem at the EAB. In the March 13, 1985 submittal, the licensee stated that they felt that the assumptions used in this analysis are equally applicable to an evaluation of the consequences of a fuel handling accident inside the auxiliary building with no credit taken for operation of the charcoal filters and that the resulting dose would be well within the guidelines of 10 CFR Part 100. Therefore, the licensee felt that the operation of the charcoal filters should not be required.

The licensee proposed the addition of the requirement for a negative pressure to exist in the auxiliary building while moving irradiated fuel. This insures air flow into the building and out through the plant vent, in order that any release of activity due to a fuel handling accident could be monitored.

The function of the charcoal filter system is to mitigate the potential consequences of a postulated fuel handling accident inside the auxiliary building. The consequences, as expressed by calculated dose at the EAB, are determined in accordance with the guidance of the Standard Review Plan and Regulatory Guide 1.25. These guidelines detail a number of assumptions to be used in the analysis. These are:

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1. It is assumed that the accident occurs 100 hours after shutdown.
2. The discharged assembly is assumed to have operated at peak power (1.66) for the previous cycle.
3. The guidelines require an assumption that 100% of the volatile fission product inventory be released.
4. An appropriate decontamination factor is assumed for iodine removal in water (Ref. 2).

According to Reference 1, the effect of the charcoal filters is to reduce the calculated dose at the EAB from 96 to 34 rem. The licensee presents that these assumptions are overly conservative and that this reduction in calculated dose could be duplicated by an adjustment in the assumptions outlined above, and, that the charcoal filters do not provide any significant real benefit in reduction of exposure to plant personnel and the general public.

It is the staff's position that the assumptions are reasonable and should not be altered; therefore, the 96 rem calculated dose at the EAB should not be reduced. The use of the filters is needed to achieve a significant reduction in the calculated dose. Thus, adequate justification has not been presented to grant the amendment request and it should be denied.

3.0 REFERENCES

1. Letter, Mr. D. M. Crutchfield, NRC, to Mr. J. E. Maier, RG&E, October 7, 1981.
2. WCAP-7828, Radiological Consequences of a Fuel Handling Accident, Westinghouse Electric Corporation, 1971.

4.0 ACKNOWLEDGMENT

C. Miller prepared this Safety Evaluation.

Dated: May 30, 1985.

UNITED STATES NUCLEAR REGULATORY COMMISSIONROCHESTER GAS AND ELECTRIC CORPORATIONDOCKET NO. 50-244DENIAL OF AMENDMENT TO FACILITY OPERATING LICENSEAND OPPORTUNITY FOR HEARING

The U. S. Nuclear Regulatory Commission (the Commission) has denied a request by Rochester Gas and Electric Corporation (the licensee) for an amendment to Facility Operating License No. DPR-18, issued to the Rochester Gas and Electric Corporation for operation of the R. E. Ginna Nuclear Power Plant in Wayne County, New York.

The amendment, as proposed by the licensee, would change the Technical Specifications to delete the requirement that charcoal filters operate while fuel assemblies are being moved in the auxiliary building.

The licensee was notified of the Commission's denial of the proposed Technical Specification changes by letter dated May 30, 1985.

By July 5, 1985 the licensee may demand a hearing with respect to the denial described above and any person whose interest may be affected by this proceeding may file a written petition for leave to intervene.

A request for a hearing or petition for leave to intervene must be filed with the Secretary of the Commission, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, Attention: Docketing and Service Branch, or may be delivered to the Commission's Public Document Room, 1717 H Street, N.W., Washington, D.C., by the above date.

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A copy of any petitions should also be sent to the Executive Legal Director, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, and to Harry H. Voigt, Esquire, LeBoeuf, Lamb, Leiby and MacRae, 1333 New Hampshire Avenue, N.W., Suite 1100, Washington, D.C. 20036, attorney for the licensee.

For further details with respect to this action, see (1) the application for amendment dated March 13, 1985, and (2) the Commission's Safety Evaluation dated May 30, 1985, which 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 14610. A copy of item (2) 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 30th day of May 1985.

FOR THE NUCLEAR REGULATORY COMMISSION

Walter A. Paulson

Walter A. Paulson, Acting Chief
Operating Reactors Branch No. 5
Division of Licensing