A Subsidiary of RGS Energy Group, Inc.

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ROBERT C. MECREDY
Vice President
Nuclear Operations

October 25, 2001

U.S. Nuclear Regulatory Commission
Document Control Desk
Attn: Robert Clark
Project Directorate I
Washington, D.C. 20555

Subject: Application for Amendment to Facility Operating License
Elimination of Post Accident Sampling System (PASS)
Sampling Requirements
Rochester Gas and Electric Corporation
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

Reference: WCAP-14986-A, Rev 2, "Westinghouse Owners Group Post Accident Sampling System Requirements: A Technical Basis"

Dear Mr. Clark:

The enclosed License Amendment Request (LAR) proposes to revise Ginna Station Improved Technical Specifications to eliminate the requirements for having and maintaining the Post Accident Sampling System (PASS). Technical justification for this change is included in WCAP-14986-A, Rev 2, "Westinghouse Owners Group Post Accident Sampling System Requirements: A Technical Basis", and approved by the NRC in the associated Safety Evaluation dated June 14, 2000. This change is being submitted in accordance with the provisions of 10CFR50.90 and is consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-366, "Elimination of Requirements for a Post Accident Sampling System (PASS). The availability of this technical specification improvement was announced in the Federal Register on October 31, 2000 as part of the Consolidated Line Item Improvement Process (CLIIP). As part of this License Amendment Request, RG&E is making specific regulatory commitments as described in Attachment 4.

A001

Rec'd 01/15/02

1000361

RG&E requests that upon NRC approval, this LAR should be effective immediately and implemented within 60 days.

Very truly yours,

Robert C. Mecredy

Attachments

xc: Mr. Robert Clark (Mail Stop O-8-E9)
Project Directorate I
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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Albany, NY 12203-6399

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of	)	
	)	
Rochester Gas and Electric Corporation	)	Docket No. 50-244
(R.E. Ginna Nuclear Power Plant)	)	

APPLICATION FOR AMENDMENT
TO OPERATING LICENSE

Pursuant to Section 50.90 of the regulations of the U.S. Nuclear Regulatory Commission (the "Commission"), Rochester Gas and Electric Corporation ("RG&E"), holder of Facility Operating License No. DPR-18, hereby requests that the Improved Technical Specifications set forth in Appendix A to that license be amended. This request for change in Improved Technical Specifications is to eliminate the requirements for maintaining the Post Accident Sampling System (PASS).

Attachment 1 provides a description of the proposed change, the requested confirmation of applicability, and plant specific verifications. Attachment 2 provides the existing TS pages marked-up to show the proposed change. Attachment 3 provides revised clean technical specification pages. Attachment 4 provides a summary of regulatory commitments made in this submittal. Attachment 5 provides the existing TS Bases marked-up to show the proposed change (for information only).

WHEREFORE, Applicant respectfully requests that Appendix A to Facility Operating License No. DPR-18 be amended in the form attached hereto as Attachment 3.

Rochester Gas and Electric Corporation

By _____
Robert C. Mecredy
Vice President
Nuclear Operations Group

Subscribed and sworn to before me
on this 25th day of October, 2001.

_____
Notary Public

SHARON L. MILLER
Notary Public, State of New York
Registration No. 01MI6017755
Monroe County
Commission Expires December 21, 2002

ATTACHMENT 1

Description and Assessment

1.0 DESCRIPTION

The proposed License amendment deletes the program requirements of TS (5.5.3), "Post Accident Sampling System (PASS)." The changes are consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-366. The availability of this technical specification improvement was announced in the *Federal Register* on October 31, 2000 as part of the Consolidated Line Item Improvement Process (CLIIP).

2.0 ASSESSMENT

2.1 Applicability of Published Safety Evaluation

Rochester Gas and Electric Corporation ("RG&E") has reviewed the safety evaluation published on October 31, 2000 as part of the CLIIP. This verification included a review of the NRC staff's evaluation as well as the supporting information provided to support TSTF-366 (i.e., WCAP-14986-A, Rev.2, "Post Accident Sampling System Requirements: A Technical Basis," submitted October 26, 1998, as supplemented by letters dated April 28, 1999, April 10 and May 22, 2000). RG&E has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to Ginna Station, and justify this amendment for the incorporation of the changes to the Ginna Station Improved Technical Specifications.

2.2 Optional Changes and Variations

RG&E is not proposing any variations or deviations from the technical specification changes described in TSTF-366 or the NRC staff's model safety evaluation published on October 31, 2000.

(1) Requirements for installing and maintaining PASS were included in a confirmatory order for Ginna Station issued on July 18, 1981. This amendment request includes superseding the requirements imposed by that confirmatory order.

(2) The elimination of PASS results in changes to the discussion in the Bases section for TS 3.3.3, "Post Accident Monitoring Instrumentation". The current Bases mention the capabilities of PASS as a backup to the hydrogen monitor channels. Possible wording for the revised Bases discussion for TS 3.3.3 is provided in Attachment 5. RG&E will formally address the change to the Bases in

accordance with Specification 5.5.13, Technical Specification (TS) Bases Control Program, and will provide the actual revised Bases pages in a future submittal.

3.0 REGULATORY ANALYSIS

3.1 No Significant Hazards Determination

RG&E has reviewed the proposed no significant hazards consideration determination published as part of the CLIIP. RG&E has concluded that the proposed determination presented in the notice is applicable to Ginna Station and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

3.2 Verification and Commitments

As discussed in the notice of availability published in *Federal Register* for this technical specification improvement, plant-specific verifications were performed as follows:

1. RG&E will maintain contingency plans for obtaining and analyzing highly radioactive samples of reactor coolant, containment sump, and containment atmosphere. The contingency plans will be contained in plant procedures and will be effective with the implementation of the License amendment. Maintaining the contingency plans is considered a regulatory commitment.

2. The capability for classifying fuel damage events at the Alert level threshold has been established for Ginna Station at core damage levels approximating radioactivity levels of 300 uCi/cc dose equivalent iodine. This capability will be described in plant procedures and will be effective with the implementation of the License amendment. The capability for classifying fuel damage events is considered a regulatory commitment.

3. RG&E has established the capability to monitor radioactive iodines that have been released to offsite environs. This capability is described in plant procedures. The capability to monitor radioactive iodines is considered a regulatory commitment.

4.0 ENVIRONMENTAL EVALUATION

RG&E has reviewed the environmental evaluation included in the model safety evaluation published as part of the CLIIP. RG&E has concluded that the staff's findings presented in that evaluation are applicable to Ginna Station and the evaluation is hereby incorporated by reference for this application.

5.0 References

1. Industry/TSTF Standard Technical Specification Change Traveler TSTF-366, "Elimination of Requirements for a POST Accident Sampling System (PASS)."

2. Federal Register, Vol. 65, No. 211, "Notice of Availability for Referencing In License Amendment Applications Model Safety Evaluation on Technical Specification Improvement to Eliminate Requirements on Post Accident Sampling Systems Using the Consolidated Line Item Improvement Process, " dated October 31, 2000.

3. Westinghouse Owners Group (WOG) topical report WCAP-14986-A, Rev. 2, "Post Accident Sampling System Requirements: A Technical Basis," July 2000.

ATTACHMENT 2

PROPOSED TECHNICAL SPECIFICATION CHANGES (MARK-UP)

5.0 ADMINISTRATIVE CONTROLS

5.5 Programs and Manuals

The following programs and manuals shall be established, implemented, and maintained.

5.5.1 Offsite Dose Calculation Manual (ODCM)

The ODCM shall contain:

a. The methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm and trip setpoints, and in the conduct of the radiological environmental monitoring program; and

b. The radioactive effluent controls and radiological environmental monitoring activities and descriptions of the information that should be included in the Annual Radiological Environmental Operating and Radioactive Effluent Release Reports.

Licensee initiated changes to the ODCM:

a. Shall be documented and records of reviews performed shall be retained. This documentation shall contain:

   1. sufficient information to support the change(s) together with the appropriate analyses or evaluations justifying the change(s),

   2. a determination that the change(s) maintain the levels of radioactive effluent control required by 10 CFR 20.1302, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I, and does not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations;

b. Shall become effective after review and acceptance by the onsite review function and the approval of the plant manager; and

c. Shall be submitted to the NRC in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Radioactive Effluent Release Report for the period of the report in which any change in the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (i.e., month and year) the change was implemented.

5.5.2 Primary Coolant Sources Outside Containment Program

This program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident. The systems include Containment Spray, Safety Injection, and Residual Heat Removal in the recirculation configuration. The program shall include the following:

a. Preventive maintenance and periodic visual inspection requirements; and

b. Integrated leak test requirements for each system at refueling cycle intervals or less.

5.5.3 Deleted

~~Post Accident Sampling Program~~

~~This program provides controls that ensure the capability to obtain and analyze reactor coolant, radioactive gases, and particulates in plant gaseous effluents and containment atmosphere samples under accident conditions. The program shall include the following:~~

~~a. Training of personnel;~~

~~b. Procedures for sampling and analysis; and~~

~~c. Provisions for maintenance of sampling and analysis equipment.~~

5.5.4 Radioactive Effluent Controls Program

This program conforms to 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to members of the public from radioactive effluents as low as reasonably achievable. The program shall be contained in the ODCM, shall be implemented by procedures, and shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

a. Limitations on the functional capability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM;

b. Limitations on the concentrations of radioactive material released in liquid effluents to unrestricted areas, conforming to ten times the concentration values in 10 CFR 20, Appendix B, Table 2, Column 2;

c. Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.1302 and with the methodology and parameters in the ODCM;

d. Limitations on the annual and quarterly doses or dose commitment to a member of the public from radioactive materials in liquid effluents released from the plant to unrestricted areas, conforming to 10 CFR 50, Appendix I and 40 CFR 141;

e. Determination of cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days;

f. Limitations on the functional capability and use of the liquid and gaseous effluent treatment systems to ensure that appropriate portions of these systems are used to reduce releases of radioactivity when the projected doses in a period of 31 days would exceed 2% of the guidelines for the annual dose or dose commitment, conforming to 10 CFR 50, Appendix I;

g. Limitations on the dose rate resulting from radioactive material released in gaseous effluents to areas beyond the site boundary conforming to the dose associated with 10 CFR 20, Appendix B, Table 2, Column 1;

h. Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from the plant to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I;

i. Limitations on the annual and quarterly doses to a member of the public from iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half lives > 8 days in gaseous effluents released from the plant to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I; and

j. Limitations on the annual dose or dose commitment to any member of the public due to releases of radioactivity and to radiation from uranium fuel cycle sources, conforming to 40 CFR 190.

5.5.5 Component Cyclic or Transient Limit Program

This program provides controls to track the reactor coolant system cyclic and transient occurrences specified in UFSAR Table 5.1-4 to ensure that components are maintained within the design limits.

5.5.6 Pre-Stressed Concrete Containment Tendon Surveillance Program

This program provides controls for monitoring any tendon degradation in pre-stressed concrete containments, including effectiveness of its corrosion protection medium, to ensure containment structural integrity. The Tendon Surveillance Program, inspection frequencies, and acceptance criteria shall be in accordance with Regulatory Guide 1.35, Revision 2.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Tendon Surveillance Program inspection frequencies.

5.5.7 Inservice Testing Program

This program provides controls for inservice testing of ASME Code Class 1, 2, and 3 components including applicable supports. The program shall include the following:

a. Testing frequencies specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as follows:

ASME Boiler and Pressure Vessel Code and applicable Addenda terminology for inservice testing activities	Required Frequencies for performing inservice testing activities
Weekly	At least once per 7 days
Monthly	At least once per 31 days
Quarterly or every 3 months	At least once per 92 days
Semiannually or every 6 months	At least once per 184 days
Every 9 months	At least once per 276 days
Yearly or annually	At least once per 366 days
Biennially or every 2 years	At least once per 731 days

b. The provisions of SR 3.0.2 are applicable to the above required Frequencies for performing inservice testing activities;

c. The provisions of SR 3.0.3 are applicable to inservice testing activities; and

d. Nothing in the ASME Boiler and Pressure Vessel Code shall be construed to supersede the requirements of any Technical Specification.

5.5.8 Steam Generator (SG) Tube Surveillance Program

Each SG shall be demonstrated OPERABLE by performance of an inservice inspection program in accordance with the Nuclear Policy Manual. This inspection program shall define the specific requirements of the edition and Addenda of the ASME Boiler and Pressure Code, Section XI, as required by 10 CFR 50.55a(g). The program shall include the following:

a. The inspection intervals for SG tubes shall be specified in the Inservice Inspection Program.

b. SG tubes that have imperfections > 40% through wall, as indicated by eddy current, shall be repaired by plugging or sleeving.

c. SG sleeves that have imperfections > 30% through wall, as indicated by eddy current, shall be repaired by plugging.

5.5.9 Secondary Water Chemistry Program

This program provides controls for monitoring secondary water chemistry to inhibit SG tube degradation. This program shall include:

a. Identification of a sampling schedule for the critical variables and control points for these variables;

b. Identification of the procedures used to measure the values of the critical variables;

c. Identification of process sampling points;

d. Procedures for the recording and management of data;

e. Procedures defining corrective actions for all off control point chemistry conditions; and

f. A procedure identifying the authority responsible for the interpretation of the data and the sequence and timing of administrative events, which is required to initiate corrective action.

5.5.10 Ventilation Filter Testing Program (VFTP)

A program shall be established to implement the following required testing of Engineered Safety Feature filter ventilation systems and the Spent Fuel Pool (SFP) Charcoal Adsorber System. The test frequencies will be in accordance with Regulatory Guide 1.52, Revision 2, except that in lieu of 18 month test intervals, a 24 month interval will be implemented. The test methods will be in accordance with Regulatory Guide 1.52, Revision 2, except as modified below.

a. Containment Post-Accident Charcoal System

1. Demonstrate the pressure drop across the charcoal adsorber bank is < 3 inches of water at a design flow rate (± 10%).

2. Demonstrate that an in-place Freon test of the charcoal adsorber bank shows a penetration and system bypass < 1.0%, when tested under ambient conditions.

3. Demonstrate that a laboratory test of a sample of the charcoal adsorber, when obtained as described in Regulatory Guide 1.52, Revision 2, shows a methyl iodide penetration of less than 14.5% when tested in accordance with ASTM D3803-1989 at a test temperature of 30°C (86°F) and a relative humidity of 95%.

b. Containment Recirculation Fan Cooler System

1. Demonstrate the pressure drop across the high efficiency particulate air (HEPA) filter bank is < 3 inches of water at a design flow rate (± 10%).

2. Demonstrate that an in-place dioctylphthalate (DOP) test of the HEPA filter bank shows a penetration and system bypass < 1.0%.

c. Control Room Emergency Air Treatment System (CREATS)

1. Demonstrate the pressure drop across the HEPA filter bank is < 3 inches of water at a design flow rate (± 10%).

2. Demonstrate that an in-place DOP test of the HEPA filter bank shows a penetration and system bypass < 1.0%.

3. Demonstrate the pressure drop across the charcoal adsorber bank is < 3 inches of water at a design flow rate (± 10%).

4. Demonstrate that an in-place Freon test of the charcoal adsorber bank shows a penetration and system bypass < 1.0%, when tested under ambient conditions.

5. Demonstrate that a laboratory test of a sample of the charcoal adsorber, when obtained as described in Regulatory Guide 1.52, Revision 2, shows a methyl iodide penetration of less than 14.5% when tested in accordance with ASTM D3803-1989 at a test temperature of 30°C (86°F) and a relative humidity of 95%.

d. SFP Charcoal Adsorber System

1. Demonstrate that the total air flow rate from the charcoal adsorbers shows at least 75% of that measured with a complete set of new adsorbers.

2. Demonstrate that an in-place Freon test of the charcoal adsorbers bank shows a penetration and system bypass < 1.0%, when tested under ambient conditions.

3. Demonstrate that a laboratory test of a sample of the charcoal adsorber, when obtained as described in Regulatory Guide 1.52, Revision 2, shows a methyl iodide penetration of less than 14.5% when tested in accordance with ASTM D3803-1989 at a test temperature of 30°C (86°F) and a relative humidity of 95%.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the VFTP frequencies.

5.5.11 Explosive Gas and Storage Tank Radioactivity Monitoring Program

This program provides controls for potentially explosive gas mixtures contained in the waste gas decay tanks and the quantity of radioactivity contained in waste gas decay tanks. The gaseous radioactivity quantities shall be determined following the methodology in NUREG-0133.

The program shall include:

a. The limits for concentrations of hydrogen and oxygen in the waste gas decay tanks and a surveillance program to ensure the limits are maintained. Such limits shall be appropriate to the system's design criteria (i.e., whether or not the system is designed to withstand a hydrogen explosion); and

b. A surveillance program to ensure that the quantity of radioactivity contained in each waste gas decay tank is less than the amount that would result in a whole body exposure of ≥ 0.5 rem to any individual in an unrestricted area, in the event of an uncontrolled release of the tanks' contents.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Explosive Gas and Storage Tank Radioactivity Monitoring Program surveillance frequencies.

5.5.12 Diesel Fuel Oil Testing Program

A diesel fuel oil testing program to implement required testing of both new fuel oil and stored fuel oil shall be established. The program shall include sampling and testing requirements, and acceptance criteria, all in accordance with applicable ASTM Standards. The purpose of the program is to establish the following:

a. Acceptability of new fuel oil for use prior to addition to storage tanks by determining that the fuel oil has:

   1. an API gravity or an absolute specific gravity within limits,

   2. a flash point and kinematic viscosity within limits for ASTM 2D fuel oil, and

   3. a clear and bright appearance with proper color; and

b. Within 31 days following addition of the new fuel to the storage tanks, verify that the properties of the new fuel oil, other than those addressed in a. above, are within limits for ASTM 2D fuel oil.

5.5.13 Technical Specifications (TS) Bases Control Program

This program provides a means for processing changes to the Bases of these Technical Specifications.

a. Changes to the Bases of the TS shall be made under appropriate administrative controls and reviews.

b. Licensees may make changes to Bases without prior NRC approval provided the changes do not require either of the following:

   1. A change in the TS incorporated in the license; or

   2. A change to the UFSAR or Bases that requires NRC approval pursuant to 10 CFR 50.59.

c. The Bases Control Program shall contain provisions to ensure that the Bases are maintained consistent with the UFSAR.

d. Proposed changes that meet the criteria of Specification 5.5.13.b.1 or Specification 5.5.13.b.2 shall be reviewed and approved by the NRC prior to implementation. Changes to the Bases implemented without prior NRC approval shall be provided to the NRC on a frequency consistent with 10 CFR 50.71e.

5.5.14 Safety Function Determination Program (SFDP)

This program ensures loss of safety function is detected and appropriate actions taken. Upon entry into LCO 3.0.6, an evaluation shall be made to determine if loss of safety function exists. Additionally, other appropriate actions may be taken as a result of the support system inoperability and corresponding exception to entering supported system Condition and Required Actions. This program implements the requirements of LCO 3.0.6. The SFDP shall contain the following:

a. Provisions for cross train checks to ensure a loss of the capability to perform the safety function assumed in the accident analysis does not go undetected;

b. Provisions for ensuring the plant is maintained in a safe condition if a loss of function condition exists;

c. Provisions to ensure that an inoperable supported system's Completion Time is not inappropriately extended as a result of multiple support system inoperabilities; and

d. Other appropriate limitations and remedial or compensatory actions.

A loss of safety function exists when, assuming no concurrent single failure, a safety function assumed in the accident analysis cannot be performed. For the purpose of this program, a loss of safety function may exist when a support system is inoperable, and:

a. A required system redundant to the supported system(s) is also inoperable; or

b. A required system redundant to the system(s) in turn supported by the inoperable supported system is also inoperable; or

c. A required system redundant to the inoperable support system(s) for the supported systems (a) and (b) above is also inoperable.

The SFDP identifies where a loss of safety function exists. If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

5.5.15 Containment Leakage Rate Testing Program

A program shall be established to implement the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program," dated September 1995.

The peak calculated containment internal pressure for the design basis loss of coolant accident, P_a, is 60 psig.

The maximum allowable primary containment leakage rate, L_a, at P_a, shall be 0.2% of containment air weight per day.

Leakage Rate acceptance criteria are:

a. Containment leakage rate acceptance criterion is $\leq 1.0\ L_a$. During the first plant startup following testing in accordance with this program, the leakage rate acceptance criteria are $\leq 0.60\ L_a$ for the Type B and Type C tests and $\leq 0.75\ L_a$ for Type A tests;

b. Air lock testing acceptance criteria are:

   1. For each air lock, overall leakage rate is $\leq 0.05\ L_a$ when tested at $\geq P_a$, and

   2. For each door, leakage rate is $\leq 0.01\ L_a$ when tested at $\geq P_a$.

c. Mini-purge valve acceptance criteria is $\leq 0.05\ L_a$ when tested at $\geq P_a$.

The provisions of SR 3.0.2 do not apply to the test frequencies specified in the Containment Leakage Rate Testing Program.

The provisions of SR 3.0.3 do not apply to the test frequencies specified in the Containment Leakage Rate Testing Program.

ATTACHMENT 3

PROPOSED TECHNICAL SPECIFICATION PAGES

5.0 ADMINISTRATIVE CONTROLS

5.5 Programs and Manuals

The following programs and manuals shall be established, implemented, and maintained.

5.5.1 Offsite Dose Calculation Manual (ODCM)

The ODCM shall contain:

a. The methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm and trip setpoints, and in the conduct of the radiological environmental monitoring program; and

b. The radioactive effluent controls and radiological environmental monitoring activities and descriptions of the information that should be included in the Annual Radiological Environmental Operating and Radioactive Effluent Release Reports.

Licensee initiated changes to the ODCM:

a. Shall be documented and records of reviews performed shall be retained. This documentation shall contain:

   1. sufficient information to support the change(s) together with the appropriate analyses or evaluations justifying the change(s),

   2. a determination that the change(s) maintain the levels of radioactive effluent control required by 10 CFR 20.1302, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I, and does not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations;

b. Shall become effective after review and acceptance by the onsite review function and the approval of the plant manager; and

c. Shall be submitted to the NRC in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Radioactive Effluent Release Report for the period of the report in which any change in the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (i.e., month and year) the change was implemented.

5.5.2 Primary Coolant Sources Outside Containment Program

This program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident. The systems include Containment Spray, Safety Injection, and Residual Heat Removal in the recirculation configuration. The program shall include the following:

a. Preventive maintenance and periodic visual inspection requirements; and

b. Integrated leak test requirements for each system at refueling cycle intervals or less.

5.5.3 Deleted

5.5.4 Radioactive Effluent Controls Program

This program conforms to 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to members of the public from radioactive effluents as low as reasonably achievable. The program shall be contained in the ODCM, shall be implemented by procedures, and shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

a. Limitations on the functional capability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM;

b. Limitations on the concentrations of radioactive material released in liquid effluents to unrestricted areas, conforming to ten times the concentration values in 10 CFR 20, Appendix B, Table 2, Column 2;

c. Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.1302 and with the methodology and parameters in the ODCM;

d. Limitations on the annual and quarterly doses or dose commitment to a member of the public from radioactive materials in liquid effluents released from the plant to unrestricted areas, conforming to 10 CFR 50, Appendix I and 40 CFR 141;

e. Determination of cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days;

f. Limitations on the functional capability and use of the liquid and gaseous effluent treatment systems to ensure that appropriate portions of these systems are used to reduce releases of radioactivity when the projected doses in a period of 31 days would exceed 2% of the guidelines for the annual dose or dose commitment, conforming to 10 CFR 50, Appendix I;

g. Limitations on the dose rate resulting from radioactive material released in gaseous effluents to areas beyond the site boundary conforming to the dose associated with 10 CFR 20, Appendix B, Table 2, Column 1;

h. Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from the plant to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I;

i. Limitations on the annual and quarterly doses to a member of the public from iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half lives > 8 days in gaseous effluents released from the plant to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I; and

j. Limitations on the annual dose or dose commitment to any member of the public due to releases of radioactivity and to radiation from uranium fuel cycle sources, conforming to 40 CFR 190.

5.5.5 Component Cyclic or Transient Limit Program

This program provides controls to track the reactor coolant system cyclic and transient occurrences specified in UFSAR Table 5.1-4 to ensure that components are maintained within the design limits.

5.5.6 Pre-Stressed Concrete Containment Tendon Surveillance Program

This program provides controls for monitoring any tendon degradation in pre-stressed concrete containments, including effectiveness of its corrosion protection medium, to ensure containment structural integrity. The Tendon Surveillance Program, inspection frequencies, and acceptance criteria shall be in accordance with Regulatory Guide 1.35, Revision 2.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Tendon Surveillance Program inspection frequencies.

5.5.7 Inservice Testing Program

This program provides controls for inservice testing of ASME Code Class 1, 2, and 3 components including applicable supports. The program shall include the following:

a. Testing frequencies specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as follows:

ASME Boiler and Pressure Vessel Code and applicable Addenda terminology for inservice testing activities	Required Frequencies for performing inservice testing activities
Weekly	At least once per 7 days
Monthly	At least once per 31 days
Quarterly or every 3 months	At least once per 92 days
Semiannually or every 6 months	At least once per 184 days
Every 9 months	At least once per 276 days
Yearly or annually	At least once per 366 days
Biennially or every 2 years	At least once per 731 days

b. The provisions of SR 3.0.2 are applicable to the above required Frequencies for performing inservice testing activities;

c. The provisions of SR 3.0.3 are applicable to inservice testing activities; and

d. Nothing in the ASME Boiler and Pressure Vessel Code shall be construed to supersede the requirements of any Technical Specification.

5.5.8 Steam Generator (SG) Tube Surveillance Program

Each SG shall be demonstrated OPERABLE by performance of an inservice inspection program in accordance with the Nuclear Policy Manual. This inspection program shall define the specific requirements of the edition and Addenda of the ASME Boiler and Pressure Code, Section XI, as required by 10 CFR 50.55a(g). The program shall include the following:

a. The inspection intervals for SG tubes shall be specified in the Inservice Inspection Program.

b. SG tubes that have imperfections > 40% through wall, as indicated by eddy current, shall be repaired by plugging or sleeving.

c. SG sleeves that have imperfections > 30% through wall, as indicated by eddy current, shall be repaired by plugging.

5.5.9 Secondary Water Chemistry Program

This program provides controls for monitoring secondary water chemistry to inhibit SG tube degradation. This program shall include:

a. Identification of a sampling schedule for the critical variables and control points for these variables;

b. Identification of the procedures used to measure the values of the critical variables;

c. Identification of process sampling points;

d. Procedures for the recording and management of data;

e. Procedures defining corrective actions for all off control point chemistry conditions; and

f. A procedure identifying the authority responsible for the interpretation of the data and the sequence and timing of administrative events, which is required to initiate corrective action.

5.5.10 Ventilation Filter Testing Program (VFTP)

A program shall be established to implement the following required testing of Engineered Safety Feature filter ventilation systems and the Spent Fuel Pool (SFP) Charcoal Adsorber System. The test frequencies will be in accordance with Regulatory Guide 1.52, Revision 2, except that in lieu of 18 month test intervals, a 24 month interval will be implemented. The test methods will be in accordance with Regulatory Guide 1.52, Revision 2, except as modified below.

a. Containment Post-Accident Charcoal System

1. Demonstrate the pressure drop across the charcoal adsorber bank is < 3 inches of water at a design flow rate (± 10%).

2. Demonstrate that an in-place Freon test of the charcoal adsorber bank shows a penetration and system bypass < 1.0%, when tested under ambient conditions.

3. Demonstrate that a laboratory test of a sample of the charcoal adsorber, when obtained as described in Regulatory Guide 1.52, Revision 2, shows a methyl iodide penetration of less than 14.5% when tested in accordance with ASTM D3803-1989 at a test temperature of 30°C (86°F) and a relative humidity of 95%.

b. Containment Recirculation Fan Cooler System

1. Demonstrate the pressure drop across the high efficiency particulate air (HEPA) filter bank is < 3 inches of water at a design flow rate (± 10%).

2. Demonstrate that an in-place dioctylphthalate (DOP) test of the HEPA filter bank shows a penetration and system bypass < 1.0%.

c. Control Room Emergency Air Treatment System (CREATS)

1. Demonstrate the pressure drop across the HEPA filter bank is < 3 inches of water at a design flow rate (± 10%).

2. Demonstrate that an in-place DOP test of the HEPA filter bank shows a penetration and system bypass < 1.0%.

3. Demonstrate the pressure drop across the charcoal adsorber bank is < 3 inches of water at a design flow rate (± 10%).

4. Demonstrate that an in-place Freon test of the charcoal adsorber bank shows a penetration and system bypass < 1.0%, when tested under ambient conditions.

5. Demonstrate that a laboratory test of a sample of the charcoal adsorber, when obtained as described in Regulatory Guide 1.52, Revision 2, shows a methyl iodide penetration of less than 14.5% when tested in accordance with ASTM D3803-1989 at a test temperature of 30°C (86°F) and a relative humidity of 95%.

d. SFP Charcoal Adsorber System

1. Demonstrate that the total air flow rate from the charcoal adsorbers shows at least 75% of that measured with a complete set of new adsorbers.

2. Demonstrate that an in-place Freon test of the charcoal adsorbers bank shows a penetration and system bypass < 1.0%, when tested under ambient conditions.

3. Demonstrate that a laboratory test of a sample of the charcoal adsorber, when obtained as described in Regulatory Guide 1.52, Revision 2, shows a methyl iodide penetration of less than 14.5% when tested in accordance with ASTM D3803-1989 at a test temperature of 30°C (86°F) and a relative humidity of 95%.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the VFTP frequencies.

5.5.11 Explosive Gas and Storage Tank Radioactivity Monitoring Program

This program provides controls for potentially explosive gas mixtures contained in the waste gas decay tanks and the quantity of radioactivity contained in waste gas decay tanks. The gaseous radioactivity quantities shall be determined following the methodology in NUREG-0133.

The program shall include:

a. The limits for concentrations of hydrogen and oxygen in the waste gas decay tanks and a surveillance program to ensure the limits are maintained. Such limits shall be appropriate to the system's design criteria (i.e., whether or not the system is designed to withstand a hydrogen explosion); and

b. A surveillance program to ensure that the quantity of radioactivity contained in each waste gas decay tank is less than the amount that would result in a whole body exposure of ≥ 0.5 rem to any individual in an unrestricted area, in the event of an uncontrolled release of the tanks' contents.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Explosive Gas and Storage Tank Radioactivity Monitoring Program surveillance frequencies.

5.5.12 Diesel Fuel Oil Testing Program

A diesel fuel oil testing program to implement required testing of both new fuel oil and stored fuel oil shall be established. The program shall include sampling and testing requirements, and acceptance criteria, all in accordance with applicable ASTM Standards. The purpose of the program is to establish the following:

a. Acceptability of new fuel oil for use prior to addition to storage tanks by determining that the fuel oil has:

1. an API gravity or an absolute specific gravity within limits,

2. a flash point and kinematic viscosity within limits for ASTM 2D fuel oil, and

3. a clear and bright appearance with proper color; and

b. Within 31 days following addition of the new fuel to the storage tanks, verify that the properties of the new fuel oil, other than those addressed in a. above, are within limits for ASTM 2D fuel oil.

5.5.13 Technical Specifications (TS) Bases Control Program

This program provides a means for processing changes to the Bases of these Technical Specifications.

a. Changes to the Bases of the TS shall be made under appropriate administrative controls and reviews.

b. Licensees may make changes to Bases without prior NRC approval provided the changes do not require either of the following:

1. A change in the TS incorporated in the license; or

2. A change to the UFSAR or Bases that requires NRC approval pursuant to 10 CFR 50.59.

c. The Bases Control Program shall contain provisions to ensure that the Bases are maintained consistent with the UFSAR.

d. Proposed changes that meet the criteria of Specification 5.5.13.b.1 or Specification 5.5.13.b.2 shall be reviewed and approved by the NRC prior to implementation. Changes to the Bases implemented without prior NRC approval shall be provided to the NRC on a frequency consistent with 10 CFR 50.71e.

5.5.14 Safety Function Determination Program (SFDP)

This program ensures loss of safety function is detected and appropriate actions taken. Upon entry into LCO 3.0.6, an evaluation shall be made to determine if loss of safety function exists. Additionally, other appropriate actions may be taken as a result of the support system inoperability and corresponding exception to entering supported system Condition and Required Actions. This program implements the requirements of LCO 3.0.6. The SFDP shall contain the following:

a. Provisions for cross train checks to ensure a loss of the capability to perform the safety function assumed in the accident analysis does not go undetected;

b. Provisions for ensuring the plant is maintained in a safe condition if a loss of function condition exists;

c. Provisions to ensure that an inoperable supported system's Completion Time is not inappropriately extended as a result of multiple support system inoperabilities; and

d. Other appropriate limitations and remedial or compensatory actions.

A loss of safety function exists when, assuming no concurrent single failure, a safety function assumed in the accident analysis cannot be performed. For the purpose of this program, a loss of safety function may exist when a support system is inoperable, and:

a. A required system redundant to the supported system(s) is also inoperable; or

b. A required system redundant to the system(s) in turn supported by the inoperable supported system is also inoperable; or

c. A required system redundant to the inoperable support system(s) for the supported systems (a) and (b) above is also inoperable.

The SFDP identifies where a loss of safety function exists. If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

5.5.15 Containment Leakage Rate Testing Program

A program shall be established to implement the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program," dated September 1995.

The peak calculated containment internal pressure for the design basis loss of coolant accident, P_a, is 60 psig.

The maximum allowable primary containment leakage rate, L_a, at P_a, shall be 0.2% of containment air weight per day.

Leakage Rate acceptance criteria are:

a. Containment leakage rate acceptance criterion is $\leq 1.0\ L_a$. During the first plant startup following testing in accordance with this program, the leakage rate acceptance criteria are $\leq 0.60\ L_a$ for the Type B and Type C tests and $\leq 0.75\ L_a$ for Type A tests;

b. Air lock testing acceptance criteria are:

   1. For each air lock, overall leakage rate is $\leq 0.05\ L_a$ when tested at $\geq P_a$, and

   2. For each door, leakage rate is $\leq 0.01\ L_a$ when tested at $\geq P_a$.

c. Mini-purge valve acceptance criteria is $\leq 0.05\ L_a$ when tested at $\geq P_a$.

The provisions of SR 3.0.2 do not apply to the test frequencies specified in the Containment Leakage Rate Testing Program.

The provisions of SR 3.0.3 do not apply to the test frequencies specified in the Containment Leakage Rate Testing Program.

ATTACHMENT 4

LIST OF REGULATORY COMMITMENTS

The following identifies those actions committed to by RG&E in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

REGULATORY COMMITMENTS

RG&E will maintain contingency plans for obtaining and analyzing highly radioactive samples of reactor coolant, containment sump, and containment atmosphere. The contingency plans will be contained in plant procedures and will be effective with the implementation of the License amendment. Maintaining the contingency plans is considered a regulatory commitment.

The capability for classifying fuel damage events at the Alert level threshold has been established for Ginna Station at core damage levels approximating radioactivity levels of 300 uCi/cc dose equivalent iodine. This capability will be described in plant procedures and will be effective with the implementation of the License amendment. The capability for classifying fuel damage events is considered a regulatory commitment.

RG&E has established the capability to monitor radioactive iodines that have been released to offsite environs. This capability is described in plant procedures. The capability to monitor radioactive iodines is considered a regulatory commitment.

ATTACHMENT 5

POSSIBLE CHANGES TO TS BASES PAGES
(For Information Only)

Containment Sump B Water Level is used to determine:

- containment sump level for accident diagnosis;
- when to begin the recirculation procedure; and
- whether to terminate SI, if still in progress.

Level transmitters LT-942 and LT-943, each with five discrete level switches, provide the two required channels for this function.

9. Containment Pressure (Wide Range)

Containment Pressure (Wide Range) is a Type A variable provided for verification of RCS and containment OPERABILITY.

Containment Pressure (Wide Range) is used to determine the type of accident in progress and when, and if, to use emergency operating procedure containment adverse values.

Any of the following combinations of pressure transmitters comprise the two required channels for this function:

- PT-946 and PT-948; or
- PT-950 and PT-948.

10. Containment Area Radiation (High Range)

Containment Area Radiation (High Range) is a Type E Category I variable provided to monitor for the potential of significant radiation releases into containment and to provide release assessment for use by operators in determining the need to invoke site emergency plans.

Containment radiation level is used to determine the type of accident in progress (e.g., LOCA), and when, or if, to use emergency operating procedure containment adverse values.

Radiation monitors R-29 and R-30 are used to provide the two required channels for this function.

11. Hydrogen Monitors

Hydrogen Concentration is a Type C Category I variable provided to detect high hydrogen concentration conditions that represent a potential for containment breach from a hydrogen explosion. This variable is also important in verifying the adequacy of mitigating actions.

Hydrogen monitors HMSLCPA and HMSLCPB provide the two required channels for this function. In addition, the Post Accident Sampling System may take the place of one of these monitors provided that monitor HMSLCPA or HMSLCPB remains OPERABLE.The PASS system Hydrogen Function is not required to provide continuous readout in the control room or relay room for OPERABILITY. The use of the PASS system is allowed due to the long time period following the accident before hydrogen monitoring would be required (Ref. 4). Since the PASS system does not receive power from any safeguards buses, there are no support system LCOs related to its OPERABILITY (i.e., LCO 3.0.6 is not relevant). Instead, OPERABILITY of the PASS ~~system is addressed by the Post Accident Sampling Program (Specification 5.5.3).~~ Hydrogen Monitor is addressed by the TRM.

12. Condensate Storage Tank Level

Condensate Storage Tank (CST) Level is a Type A variable provided to ensure a water supply is available for the preferred Auxiliary Feedwater (AFW) System. The CST consists of two identical tanks connected by a common outlet header.

CST level is used to determine:

- if sufficient CST inventory is available immediately following a loss of normal feedwater or small break LOCA; and
- when to manually replenish the CST or align the safety related source of water (service water) to the preferred AFW system.

Level transmitters LT-2022A and LT-2022B provide the two required channels for this function. However, only the level transmitter associated with the CST(s) required by LCO 3.7.6, "Condensate Storage Tank(s)" are required for this LCO.

13. Refueling Water Storage Tank Level

Refueling Water Storage Tank (RWST) Level is a Type A variable provided for verifying a water source to the SI, RHR, and Containment Spray (CS) Systems.

The RWST level accuracy is established to allow an adequate supply of water to the SI, RHR, and CS pumps during the switchover to the recirculation phase of an accident. A high degree of accuracy is required to maximize the time available to the operator to complete the switchover to the sump recirculation phase and ensure sufficient water is available to maintain adequate net positive suction head (NPSH) to operating pumps.