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ROCHESTER GAS AND ELECTRIC CORPORATION • 89 EAST AVENUE, ROCHESTER, N.Y. 14649-0001 • 716 546-2700

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ROBERT C. MECREDY

Vice President

Nuclear Operations

March 18, 2002

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  
Regarding Proposed Change to Plant Staff Qualification (Specification 5.3.1)  
Rochester Gas and Electric Corporation  
R.E. Ginna Nuclear Power Plant  
Docket No. 50-244

Dear Mr. Clark:

In accordance with the provisions of 10 CFR 50.90, Rochester Gas & Electric Corporation (RG&E) is submitting a request for an amendment to the Technical Specifications (TS) for Ginna Station.

The proposed amendment would modify TS administrative requirements for plant staff qualifications for the operations manager position from ANSI Standard N18.1-1971, as supplemented by Regulatory Guide 1.8, Revision 1, September 1975, to Regulatory Guide 1.8, Revision 3, May 2000, in TS Specification 5.3.1.

Enclosure 1 provides a description and assessment of the proposed change. Attachment 1 provides the existing TS page marked up to show the proposed change. Attachment 2 provides revised (clean) TS page. There are no additional commitments associated with this amendment request.

It has been determined that this amendment application does not involve a significant hazard consideration as determined per 10 CFR 50.92. Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment needs to be prepared in connection with the issuance of this amendment.

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Approval of this amendment application is requested at your earliest convenience. Once approved, this amendment will be implemented within 60 days.

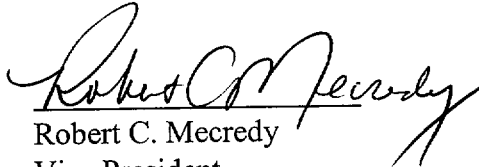
In accordance with 10 CFR 50.91, a copy of this amendment application is being provided to the designated New York State official.

I declare under penalty of perjury under the laws of the United States of America that I am authorized by Rochester Gas and Electric Corporation to make this request and that the foregoing is true and correct.

If you should have any questions regarding this submittal, please contact Mr. Tom Harding, 585-771-3384.

Very truly yours,

Executed on March 18, 2002

  
Robert C. Mecredy  
Vice President  
Nuclear Operations Group

Enclosure:

1) Evaluation of Proposed Change

Attachments:

- 1) Proposed Technical Specification Change (mark-up)
- 2) Proposed Technical Specification Page (retyped)

xc: Mr. Robert Clark (Mail Stop O-8-C2)  
Project Directorate I  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

Regional Administrator, Region 1  
U.S. Nuclear Regulatory Commission  
475 Allendale Road  
King of Prussia, PA 19406

U.S. NRC Ginna Senior Resident Inspector

Mr. William M. Flynn, President  
New York State Energy, Research, and Development Authority  
Corporate Plaza West  
286 Washington Avenue Extension  
Albany, NY 12203-6399

Mr. Paul Eddy  
NYS Department of Public Service  
3 Empire Plaza  
Albany, NY 12223

**ENCLOSURE 1**  
R.E. Ginna Nuclear Power Plant

**Evaluation of Proposed Change**

Subject:        Operations Manager Qualification Requirements in Specification 5.3.1

1.0    DESCRIPTION

2.0    PROPOSED CHANGE

3.0    BACKGROUND

4.0    TECHNICAL ANALYSIS

5.0    REGULATORY SAFETY ANALYSIS

5.1    No Significant Hazards Consideration

5.2    Applicable Regulatory Requirements/Criteria

6.0    ENVIRONMENTAL CONSIDERATION

7.0    REFERENCES

## **1.0 DESCRIPTION**

This proposed change to the Ginna Station Technical Specifications (TS) endorses Regulatory Guide 1.8, Revision 3, "Qualification and Training of Personnel for Nuclear Power Plants" for the operations manager position.

## **2.0 PROPOSED CHANGE**

The following is the proposed change that is required to modify the Ginna Station licensing basis for the operations manager position from ANSI Standard N18.1-1971, as supplemented by Regulatory Guide 1.8, Revision 1, September 1975, to Regulatory Guide 1.8, Revision 3, May 2000 (see Attachment 1).

### **Specification 5.3.1**

- a. The words ", except for the operations manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, Revision 3, May 2000" shall be inserted after "positions".

## **3.0 BACKGROUND**

Paragraph 50.34(b)(6)(i) of 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities", requires that an application for a license to operate a nuclear power plant include information concerning organizational structure, personnel qualifications, and related matters. Regulatory Guide 1.8, Revision 3, describes a method acceptable to the Nuclear Regulatory Commission (NRC) staff for complying with those portions of the Commission's regulations with regards to the qualifications of nuclear power plant personnel. It has been concluded that Revision 3 of Regulatory Guide 1.8, May 2000, provides clearer requirements regarding the operations manager position and allows for alternatives to the current requirement that a candidate for the position hold a Senior Operators License (SRO) at the time of appointment. It would be beneficial to modify the Ginna Station commitment to this standard to allow for a broader base of qualified candidates. The current Ginna Station TS section 5.2.2.e states that the operations manager or operations middle manager shall hold a SRO license.

## **4.0 TECHNICAL ANALYSIS**

There is no technical Analysis associated with the proposed change as it is of purely an administrative nature.

## 5.0 REGULATORY SAFETY ANALYSIS

### 5.1 No Significant Hazards Determination

Rochester Gas & Electric Corporation (RG&E) has evaluated whether or not a significant hazards consideration is involved with the proposed amendment(s) by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No

The proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed change provides enhancement to the current requirements and clarifies the qualification requirements for the operations manager position. This provides additional assurance that the personnel filling this position will be properly qualified. Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No

The proposed change will not create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed change provides enhancement to the current requirements and clarifies the qualification requirements for the operations manager position. There are no structures, systems, or components affected by this change. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

Response: No

The proposed change does not involve a significant reduction in a margin of safety. The proposed change provides enhancement to the current requirements and clarifies the qualification requirements for the operations manager position.

This provides additional assurance that the personnel filling this position will be properly qualified. Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, RG&E concludes that the proposed amendment(s) present no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

## **5.2 Applicable Regulatory Requirements/Criteria**

10CFR50.34(b)(6)(i) requires that an application for a license to operate a nuclear power plant include information concerning organizational structure, personnel qualifications, and related matters.

Regulatory Guide 1.8, Revision 3, May 2000, describes a method acceptable to the Nuclear Regulatory Commission (NRC) staff for complying with those portions of the Commission's regulations with regards to the qualifications of nuclear power plant personnel.

The change proposed provides compliance with the applicable regulatory requirements.

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

## **6.0 ENVIRONMENTAL EVALUATION**

The proposed amendment is confined to changes to recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(10). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

## **7.0 REFERENCES**

- 7.1 Regulatory Guide 1.8, Revision 3, Qualification and Training of Personnel for Nuclear Power Plants, dated May 2000.

**ATTACHMENT 1**  
R.E. Ginna Nuclear Power Plant

**PROPOSED TECHNICAL SPECIFICATION CHANGE (MARK-UP)**



5.0 ADMINISTRATIVE CONTROLS

5.3 Plant Staff Qualifications

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- 5.3.1 Each member of the plant staff shall meet or exceed the minimum qualifications of ANSI Standard N18.1-1971, as supplemented by Regulatory Guide 1.8, Revision 1, September 1975, for comparable positions.
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*, except for the operations manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, Revision 3, May 2000*

**ATTACHMENT 2**  
R.E. Ginna Nuclear Power Plant

**PROPOSED TECHNICAL SPECIFICATION PAGE**

## 5.0 ADMINISTRATIVE CONTROLS

5.3 Plant Staff Qualifications

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5.3.1 Each member of the plant staff shall meet or exceed the minimum qualifications of ANSI Standard N18.1-1971, as supplemented by Regulatory Guide 1.8, Revision 1, September 1975, for comparable positions, except for the operations manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, Revision 3, May 2000.

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