Attachment A

1. Revise the Technical Specifications by removing existing pages 2.1-3 and 2.1-4 and inserting the enclosed page 2.1-3.

Since it is possible to have somewhat greater enthalpy rise hot channel factors at part power than at full power due to the deeper control bank insertion which is permitted at part power, a conservative allowance has been made in obtaining the curves in Figure 2.1-1 for an increase in $F^N_{\Delta H}$ with decreasing power levels. Rod withdrawal block and load runback occurs before reactor trip set points are reached.

The Reactor Control and Protective System is designed to prevent any anticipated combination of transient conditions for reactor coolant system temperature, pressure and thermal power level that would result in there being less than a 95% probability at a 95% confidence level that DNB would not occur.(2)

(1) FSAR, Section 3.2.2

(2) Safety Evaluation for R.E. Ginna Transition to 14 x 14 Optimized Fuel Assemblies, Westinghouse Electric Corporation, November 1983.

Attachment B

In preparation of the proposed Technical Specification related to the use of Westinghouse Optimized Fuel as a reload fuel for Ginna, which was submitted on December 20, 1983, it was intended that the information presented in Technical Specification page 2.1-3 be deleted. This information, the identification of nuclear hot channel factors which formed the basis for the previous safety limit curves, was no longer correct and the correct basis was identified on the proposed page changes. We understand that because this portion of the change was not explicitly identified in our submittal, the NRC did not approve this change in its issuance of Amendment No. 61 dated May 1, 1984.

The proposed change remedies this inconsistency by deleting the incorrect information. In addition, for additional clarification, a revised reference to the optimized fuel analysis, is provided.

The proposed change merely corrects an administrative inconsistency in the basis. It does not revise any existing limits but is based on previously approved analyses.

Attachment C

In accordance with 10 CFR 50.91, this change to the Technical Specifications has been evaluated against three criteria to determine if the operation of the facility in accordance with the proposed amendment would:

1. involve a significant increase in the probability or consequences of an accident previously evaluated; or

2. create the possibility of a new or different kind of accident from any accident previously evaluated; or

3. involve a significant reduction in a margin of safety.

As outlined below, Rochester Gas and Electric submits that the issues associated with this amendment request are outside the criteria of 10 CFR 50.91, and therefore, a no significant hazards finding is warranted.

The changes are all administrative in nature. Amendment No. 61 approved use of Westinghouse optimized fuel based on the analysis and proposed Technical Specifications which were submitted. We understand that because this portion of the change was not explicitly identified in our submittal, the NRC did not approve this change in its issuance of Amendment No. 61 dated May 1, 1984.

The proposed change remedies this inconsistency by deleting the incorrect information. In addition, for additional clarification, a revised reference to the optimized fuel analysis, is provided.

The proposed change merely corrects an administrative inconsistency in the basis. It does not revise any existing limits but is based on previously approved analyses.

The proposed changes are conformed to the Commission's example (i) of changes that do not involve a significant hazards consideration.