



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
SUPPORTING AMENDMENT NO. 62 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 December 29, 1982, Rochester Gas and Electric Corporation (the licensee) responded to Generic Letter 82-16 (NUREG-0737 Technical Specifications) which requested the licensee to conduct a Technical Specification (TS) review regarding a number of TMI Action Items. By letter dated April 15, 1983, as supplemented by letter dated August 12, 1983, Rochester Gas and Electric Corporation requested an amendment to the Appendix A Technical Specifications appended to License No. DPR-18 for the R.E. Ginna Nuclear Power Plant (Ginna). The amendment would include requirements for (1) the limit of overtime, and (2) reporting safety valve and relief valve failures and challenges.

This amendment also corrects a typographical error on page 3.10-3 of the Technical Specifications as issued with Amendment No. 61.

A Notice of Consideration of Issuance of Amendment to License and Proposed No Significant Hazards Consideration Determination and Opportunity for Hearing related to the requested action was published in the Federal Register on September 21, 1983 (48 FR 43145). A second notice which included the licensee letter of August 12, 1983 was published in the Federal Register on May 23, 1984 (49 FR 21836). A request for hearing and public comments were not received.

2.0 BACKGROUND

NUREG-0737 "Clarification of TMI Action Plan Requirements" identified those items for which Technical Specifications (TS) are required. Technical Specifications are required to provide necessary assurance that facility operation is maintained within the limits determined acceptable following implementation at each facility.

Generic Letter 82-16 identified a number of NUREG-0737 items which require new TS or TS changes. Included in the letter was guidance on the scope of specifications which the staff would find acceptable and samples in Standard Technical Specification format.

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The licensees were requested to review their TS to determine if they were consistent with the guidance provided in GL 82-16. For those items where deviations or absence of a specification was identified, the licensees were requested to submit an application for a license amendment.

The licensee stated in a letter dated December 29, 1982 that of the 13 items identified in GL 82-16, only two were applicable to Ginna. Subsequently, the licensee requested by letter dated April 15, 1983, as supplemented August 12, 1983, changes to Section 6 of the TS for Ginna. The proposed changes would require that (1) administrative procedures be developed to limit the working hours of employees who perform safety-related functions and (2) challenges to the pressurizer power operated relief valves (PORV's) or safety valves (SV's) be reported at least annually.

The status of the 13 items identified in GL 82-16 is:

1. STA Training (I.A.1.13)

Amendment No. 42 dated May 11, 1981, incorporated TSs that specified the on duty requirements for Shift Technical Advisors (STAs). The licensee has deferred proposal of TS changes specifying training and qualification requirements for STAs pending decision on the requirements by the Commission.

2. Limit Overtime (I.A.1.3)

Covered in this Safety Evaluation.

3. Short Term Auxiliary Feedwater Evaluation (II.E.1.1)

Amendment No. 42 dated May 11, 1981, incorporated TSs that specified the means to maintain the AFW redundancy necessary to assure adequate AFW flow for normal, transient and accident conditions.

4. Safety Grade AFW System Initiation and Flow Indication (II.E.1.2)

Amendment No. 42 dated May 11, 1981, incorporated TS specifying the operability of automatic initiation system and flow indication. A safety evaluation issued August 18, 1982, noted that the Ginna auxiliary feedwater automatic initiation and flow indication systems, complied with the staff's long term safety grade requirements.

5. Dedicated Hydrogen Penetrations (II.E.4.1)

Not applicable at Ginna; the plant is equipped with internal recombiners.

6. Containment Pressure Setpoint (II.E.4.2.5)

Amendment No. 47 dated January 13, 1982, revised the containment pressure setpoint and found it to be consistent with the July 15, 1981 safety evaluation.

7. Containment Purge Valve (II.E.4.2.6)

The staff is currently reviewing this item as part of the overall containment purge review.

8. Radiation Signal on Purge Valves (II.E.4.2.7)

Amendment No. 42 dated May 11, 1981, incorporated a purge valve closure signal on sensing high radiation and specifies that if this automatic isolation function is lost, the operation may continue if the valves are kept closed.

9. Upgrade B&W AFW System (II.K.2.8)

Not applicable to Ginna.

10. Safety Grade Anticipatory Reactor Trip - B&W only (II.K.2.10)

Not applicable to Ginna.

11. Thermal Mechanical Report - B&W only

Not applicable to Ginna.

12. Reporting SV and RV Failures and Challenges (II.K.3.3)

Covered in this Safety Evaluation.

13. Anticipatory Trip on Turbine Trip (II.K.3.12)

An anticipatory trip on a turbine trip is included in the original Westinghouse design and is incorporated in the original TS.

3.0 DISCUSSION AND EVALUATION

3.1 Limit Overtime (I.A.1.3)

Generic Letter 82-16 transmitted to the licensee a revised version of the Commission's Policy Statement on nuclear power plant staff working hours. In its letter of April 15, 1983, the licensee proposed technical specifications to establish administrative procedures to limit working hours of the staff who perform safety-related functions and establish guidelines on the use of overtime. Further, by letter dated August 12, 1983, the licensee agreed to submit to the NRC any changes to the guidelines which may be made in the future. The additional commitment contained in the August 12, 1983 letter is included in the No Significant Hazards Consideration determination and Opportunity for Hearing published in the Federal Register on May 23, 1984 (49 FR 21836). The additional commitment makes the TS change more conservative than that originally submitted. Consequently, the licensee's TS change

request was modified, with the agreement of the licensee, to reflect the commitment. The staff has reviewed the licensee's proposed TS change. The proposed wording change does not directly reflect the guidelines established by the Commission Policy Statement, however, the licensee addresses all of the policy guidelines with only minor differences. The minor differences from policy guidelines are:

- exclusion of lunch relief-time from the 16 hour limitation
- limiting working hours to 72 hours in a pay week instead of any 7-day period to simplify accounting. A commitment has been made to audit records to ensure that this provision is not used to circumvent the intent of working no more than 72 hours in any 7-day period.

The staff concludes that the licensee's proposed overtime limitation policy meets the intent of the Commission policy and stated guidelines for controlling overtime hours. Since the licensee's August 12, 1983 letter also includes the commitment to submit proposed changes to the guidelines for their administrative procedures to the NRC, the staff finds the proposed TS change acceptable.

3.2 Reporting of Safety and Relief Valve Challenges and Failures (II.K.3.3)

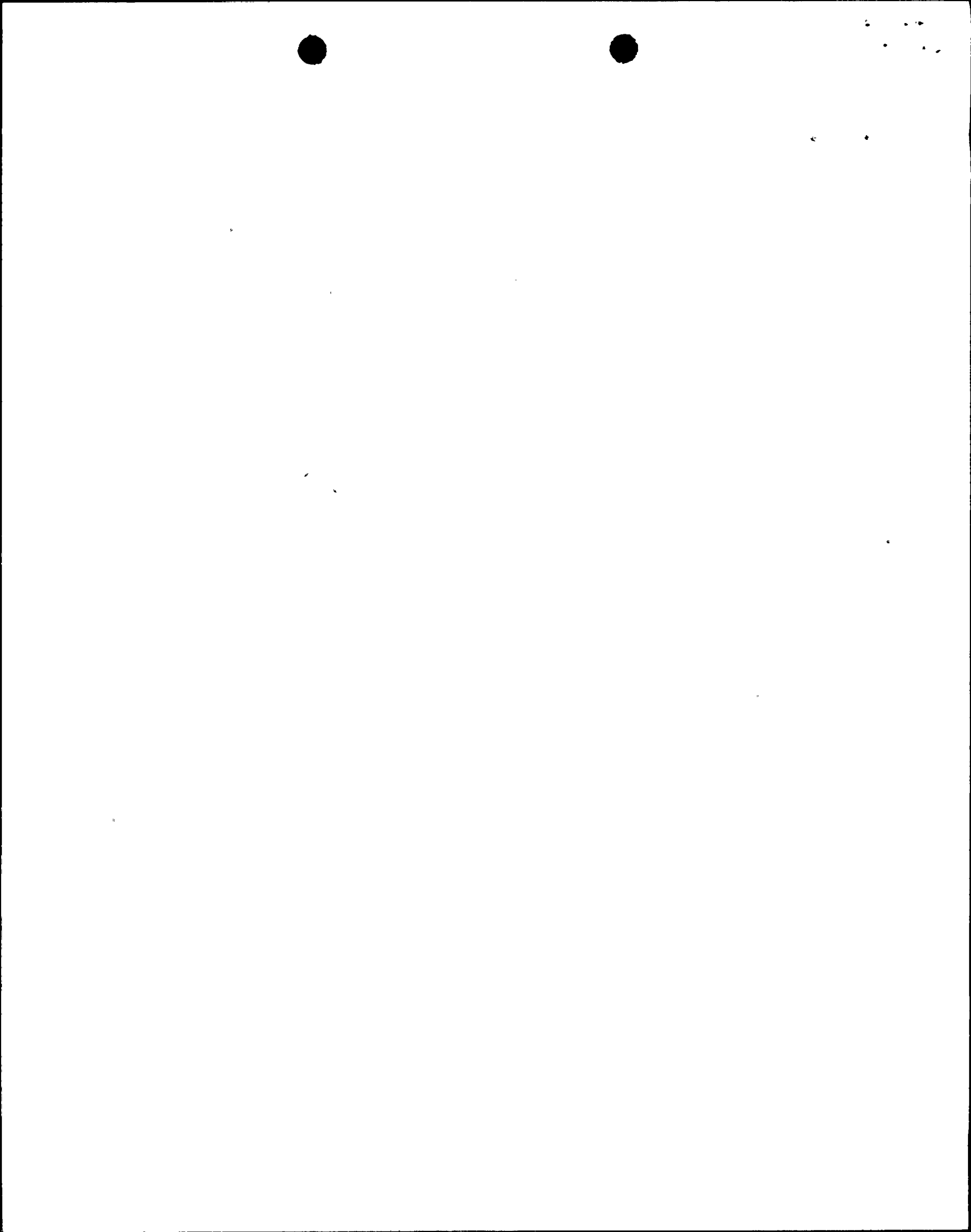
By Generic Letter 82-16, the licensee was requested to formalize reporting requirements for safety and relief valve challenges and failures. The licensee has proposed a TS change which would require the submittal of an annual report on safety and relief valve challenges and prompt notification with written followup of safety and relief valve failures. The staff finds this change acceptable.

4.0 SUMMARY

The staff has reviewed the proposed changes and finds that they would acceptably satisfy the requirements of Generic Letter 82-16.

5.0 ENVIRONMENTAL CONSIDERATION

This amendment involves a change in the recordkeeping, reporting, and administrative procedures and requirements. Accordingly, this amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.



6.0 CONCLUSION

The staff has further concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner; and (2) 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 to the health and safety of the public.

7.0 ACKNOWLEDGEMENT

W. Lazarus, Region I, prepared this evaluation.

Dated: July 31, 1984