

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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SUPPORTING AMENDMENT NO. 59 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 AND BACKGROUND

By letter dated August 1, 1983, Rochester Gas and Electric Corporation (the licensee) requested an amendment to the Technical Specifications appended to Provisional Operating License No. DPR-18 for the R.E. Ginna Nuclear Power Plant. The requested amendment would approve Technical Specification changes which would revise Table 3.5-2 to indicate the safety functions having a manually-initiated operating bypass.

A Notice of Consideration of Issuance of Amendment and Proposed No Significant Hazards Consideration Determination and Opportunity for Hearing related to the requested action was published in the <u>Federal Register</u> on November 22, 1983 (48 FR 52823). No requests for hearing and no public comments were received.

Technical Specifications set forth the operability requirements for engineered safety feature actuation (ESF) channels which specify actions which are to be taken when ESF channels are inoperable. The operability requirements are stated in terms of permissible bypass conditions. Generally, the action is identified as either hot shutdown or cold shutdown.

When an operating bypass is provided which prevents the actuation of ESF systems, the Technical Specifications (TS) indicate the conditions under which the interlock or blocking action may take place. This precludes a conflict with the operability requirements under conditions where the ESF channel is rendered inoperable due to an operating bypass. The failure to identify conditions under which safety actions are blocked by an operating bypass results in a conflict with the operability requirements for that channel. Thus, in order to preclude such conflicts, Technical Specifications should be explicit with regard to identifying the conditions under which operating bypasses will block ESF channels.

While current Standard Technical Specifications identify operating bypasses, it was found that some Westinghouse plants did not currently identify all operating bypasses under the operability requirements of ESF channels. Therefore, a review was conducted of the operability requirements for ESF



channels for all licensed Westinghouse plants. By letter dated April 28, 1983, the licensee was informed that there was a question regarding the Ginna blocking of safety injection signal during cooldown. By letter dated June 9, 1983 the licensee acknowledged that clarification of the permissible bypass conditions for the Safety Injection functions was in order.

2.0 DISCUSSION

As a result of the staff review the following comments were transmitted to the licensee:

- 1. Table 3.5-2 includes a column titled PERMISSIBLE BYPASS CONDITIONS. The entry under this column for item 1a; Manual SI is, "Primary Pressure Less than 2000 psig." This is obviously in error. Items 1c, Steam Generator Low Steam Pressure/Loop and 1d, Pressurizer Low Pressure indicated no conditions under which these safety actions may be bypassed. The table should be revised to correctly indicate those safety functions which have a manually initiated operating bypass.
- 2. Table 3.5-3 indicates no conditions under which STEAM LINE ISOLATION can be bypassed. If this is correct, no changes are required.

In response to comment 1, the licensee submitted proposed changes to the TS. In response to comment 2, the licensee stated that Table 3.5-3 is correct in indicating no conditions under which Steam Line Isolation can be bypassed. The safety injection signal can be bypassed as indicated in the proposed changes to Table 3.5-2. Since this bypass is listed elsewhere in the technical specifications, the licensee considered it inappropriate to list it in Table 3.5-2. No change to the Technical Specifications was proposed concerning this item.

3.0 EVALUATION

On Technical Specification Table 3.5-2 item 1a, Manual Safety Injection, the licensee proposed to delete the permissible bypass condition when primary pressure is less than 2000 psig. A manually initiated bypass should not apply to manual Safety Injection. This change is consistent with the Standard Technical Specification and the staff finds it acceptable.

On Technical Specification Table 3.5-2 item 1c, Safety Injection from steam generator low steam pressure signal, and item 1d, Safety Injection from pressurizer low pressure signal, the licensee proposed to add the permissible bypass condition when primary pressure is less than 2000 psig. This change is also consistent with the Standard Technical Specification. In order to bring the plant to a cold shutdown condition, blocking of safety injection is necessary, via the low steam generator pressure signal or low pressurizer pressure signal. When the plant is proceeding from a hot shutdown mode to a cold shutdown mode, the plant operators are directly involved with each operating step. Should some malfunction occur when the safety injection signal is blocked, the operators are capable of taking appropriate mitigating actions within a relatively short period of time. The staff concludes that the proposed changes are acceptable.

4.0 SUMMARY

The staff has reviewed the proposed changes in the Technical Specification Table 3.5-2, items 1a, 1c, and 1d and has determined that they are acceptable.

5.0 ENVIRONMENTAL CONSIDERATION

The staff has determined that the amendment does not authorize a change in effluent types or total amount nor an increase in power level and will not result in any significant environmental impact. Having made this determination, the staff has further concluded that the amendment involves an action which is insignificant from the standpoint of environmental impact and, pursuant to 10 CFR 51.5(d)(4), that an environmental impact statement or negative declaration and environmental impact appraisal need not 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

H. Li and G. Dick prepared this evaluation.

Dated: January 30, 1984