ATTACHMENT A

Revise the Technical Specification pages as follows:

Remove	Insert
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3.0 LIMITING CONDITION FOR OPERATION

APPLICABILITY

3.0.1 In the event a Limiting Condition for Operation and/or associated action requirements cannot be satisfied because of circumstances in excess of those addressed in the specification, within 1 hour action shall be initiated to place the unit in at least hot shutdown within the next 6 hours (i.e., a total of seven hours), and in at least cold shutdown within the following 30 hours (i.e., a total of 37 hours) unless corrective measures are completed that permit operation under the permissible action statements for the specified time interval as measured from initial discovery or until the reactor is placed in a mode in which the specification is not applicable. If the action statement corresponding to the Limiting Condition for Operation that was exceeded contains time limits to hot and cold shutdown that are less than those specified above, these more limiting time limits shall be applied. Exceptions to these requirements shall be stated in the individual specifications.

3.0.2 When a system, subsystem, train, component or device is determined to be inoperable solely because its emergency power source is inoperable, or solely because its preferred power source is inoperable, it may be considered operable for the purpose of satisfying the requirements of its applicable Limiting Condition for Operation, provided:

(1) its corresponding preferred or emergency power source is operable; and (2) all of its redundant system(s), subsystems(s), train(s), component(s) and device(s) are operable, or likewise satisfy the requirements of this specification. Unless both conditions (1) and (2) are satisfied within 1 hour, the unit shall be placed in at least hot shutdown within the next 6 hours, and in at least cold shutdown within the following 30 hours. This specification is not applicable in cold shutdown or refueling modes.

Basis

Specification 3.0.1 delineates the ACTION to be taken for circumstances not directly provided for in the ACTION statements and whose occurrence would violate the intent of the specification. For example, Specification 3.3.2 requires two Containment Spray Pumps to be operable and provides explicit action requirements if one spray pump is inoperable. Under the terms of Specification 3.0.1, if both of the required Containment Spray Pumps are inoperable, the unit is required to be in at least hot shutdown within the following 6 hours and in at least cold shutdown in the next 30 hours. These time limits apply because the time limits for one spray pump inoperable (6 hours to hot shutdown, wait 48 hours then 30 hours to cold shutdown) are less limiting. As a further example, Specification 3.3.1 requires each Reactor Coolant System accumulator to be operable and provides explicit action requirements if one accumulator is inoperable. Under the terms of Specification 3.0.1, if more than one accumulator is inoperable, within 1 hour action shall be initiated to place the unit in at least hot shutdown within 6 hours and cold shutdown within an additional 30 hours. The time limit of 6 hours

to hot shutdown and 30 hours to cold shutdown do not apply because the time limits for 1 accumulator inoperable are more limiting. It is assumed that the unit is brought to the required mode within the required times by promptly initiating and carrying out the appropriate action statement.

Specification 3.0.2 delineates what additional conditions must be satisfied to permit operation to continue, consistent with the action statements for power sources, when a preferred or emergency power source is not operable. It allows operation to be governed by the time limits of the action statement associated with the Limiting Condition for Operation for the preferred or emergency power source, not the individual action statements for each system, subsystem, train, component or device that is determined to be inoperable solely because of the inoperability of its preferred or emergency power source.

For example, Specification 3.7.2.1.a requires in part that two emergency diesel generators be operable. The action statement provides for a maximum out-of-service time when one emergency diesel generator is not operable. If the definition of operable were applied without consideration of Specification 3.0.2, all systems, subsystems, trains, components and devices supplied by the inoperable emergency power source would also be inoperable. This would dictate invoking the applicable action statements for each of the applicable Limiting Conditions for Operation. However, the provisions of Specification 3.0.2 permit the time limits for continued operation to be consistent with the action statement for the inoperable emergency diesel generator instead, provided the other specified conditions are satisfied. In this case, this would mean that the corresponding

preferred power source must be operable, and all redundant systems, subsystems, trains, components, and devices must be operable, or otherwise satisfy Specification 3.0.2 (i.e., be capable of performing their design function and have at least one preferred or one emergency power source operable). If they are not satisfied, shutdown is required in accordance with this specification.

(iii) residual heat removal loop A.*

(iv) residual heat removal loop B.*

f. Except during steam generator crevice cleaning operations, at least one of the coolant loops listed in paragraph 3.1.1.1.e shall be in operation while RCS temperature is less than 350°F. However, both reactor coolant pumps and residual heat removal pumps may be de-energized for up to 1 hour provided 1) no operations are permitted that would cause dilution of the reactor coolant system boron concentration, and 2) core outlet temperature is maintained at least 10°F below saturation temperature.

g. If the conditions of 3.1.1.1.e are not met, immediately initiate corrective action to return the required loops to operable status, and if not in cold shutdown already, be in cold shutdown within 24 hours.

h. If the conditions of 3.1.1.1.f are not met, then suspend all operations involving a reduction in boron concentration of the Reactor Coolant System and immediately initiate corrective action to return the required coolant loop to operation.

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*The preferred or emergency power source may be inoperable while in cold shutdown.

3.7 AUXILIARY ELECTRICAL SYSTEMS

Applicability

Applies to the availability of electrical power for the operation of plant auxiliaries.

Objective

To define those conditions of electrical power availability necessary to provide for the continuing availability of engineered safeguards.

3.7.1 Specification

3.7.1.1 With fuel in the reactor vessel, the following conditions are to be met:

a. One independent offsite power source operable, or backfeed through unit auxiliary transformer 11; and

b. One train of 480-volt buses (14 and 18, or 16 and 17) operable; and

c. One diesel generator operable with onsite supply of 5,000 gallons of fuel available and either buses 14 and 18, or 16 and 17, capable of being supplied from that diesel generator.

d. One battery and one dc system, and at least 150 amps of battery charger capacity to the battery must be operable.

3.7.1.2 Actions To Be Taken If Conditions of 3.7.1.1 Are Not Met: With less than the above minimum required power source operable, immediately suspend all operations involving positive reactivity changes, core alterations, movement of

irradiated fuel and initiate corrective action to restore the required power sources to operable status.

3.7.2 Specification

3.7.2.1 The reactor coolant system shall not be taken above the mode indicated unless the following conditions are met:

a. Above cold shutdown;

1. One independent offsite power source operable.

2. the 480-volt buses 14 and 18 (Train A) and buses 16 and 17 (Train B) are energized.

3. the two diesel generators are operable with onsite supply of 5,000 gallons of fuel available for each diesel generator.

4. both batteries and both dc systems are operable.

5. at least 150 amps of battery charging capacity for each DC system that is in service.

b. Above 350°F;

1. All conditions of 3.7.2.1a above are met; and

2. Two offsite sources (34.5 kv-4160 volt station service transformers, 12A with dedicated circuit 751, and 12B with dedicated circuit 767) are operable.

3.7.2.2 Actions To Be Taken If Conditions of 3.7.2.1 Are Not Met:

a. Operation above 350°F may continue with one offsite source inoperable, provided all remaining conditions of 3.7.2.1 are met.

b. With one or both independent offsite sources operable, and one diesel generator inoperable above cold shutdown, demonstrate the operability of the remaining diesel generator by:

1. Performing the surveillance requirements identified in Specifications 4.6.1.b.4 and 4.6.1.b.6 within 1 hour and at least once per 24 hours thereafter and restore the inoperable diesel generator to operable status within 7 days; <u>OTHERWISE</u>:
2. Reduce to a mode equal to or below hot shutdown within the next 6 hours and be in cold shutdown within the following 30 hours.

c. With one safety related 480V Bus (i.e., bus 14 or 16 or 17 or 18) de-energized, re-energize the bus within 1 hour or reduce to a mode equal to or below hot shutdown within the next 6 hours and be in cold shutdown within the following 30 hours, unless corrective actions are complete that permit continued operation (i.e., the bus is returned to service).

d. With both independent offsite sources inoperable, both diesel generators must be operable. In addition, restore one independent offsite source within 72 hours, <u>or</u> reduce to a mode equal to or below hot shutdown within the next 6 hours and to an RCS temperature less than or equal to 350°F within the following 6 hours.

e. Operation above cold shutdown may continue if less than 150 amps of battery charging capacity is available to one dc system, provided at least 150 amps of battery charging capacity is available to each dc system within 2 hours. If not available, reduce to a mode equal to or below hot shutdown within the next 6 hours and be in cold shutdown within the following 30 hours.

Basis for 3.7.1 and 3.7.2:

The electrical systems equipment is arranged so that no single failure can inactivate enough safeguards equipment to jeopardize the plant safety. The 480-volt safeguards equipment is arranged on 4 safeguards buses. The 4160-volt equipment (none of which is safety-related), is supplied from 4 buses.

Two separate offsite sources supply station service power to the plant.

The plant auxiliary equipment is arranged electrically so that redundant safeguards loads receive power from separate sources. In the event that 1 offsite source is not available, the remaining offsite source is capable of supplying both trains of safeguards loads. Safeguards loads such as safety injection pumps, containment fans, residual heat removal pumps, and motor control centers 1C and 1D are divided between the 480-volt buses No. 14 and 16. Redundant loads including service water pumps are supplied by buses No. 18 and 17. Together these buses form the Train A and B redundant Class 1E sources.

AC power for safeguards equipment originates from both offsite and onsite sources. The operability of these power sources and associated distribution systems ensures that sufficient power will be available to supply the safety-related equipment required for (1) the

safe shutdown of the plant, and (2) the mitigation and control of accident conditions within the plant.

When the RCS is above cold shutdown, both emergency diesel generators are required to be operable. The two diesel generators have sufficient capacity to start and run all the engineered safeguards equipment at design loads. The safeguards equipment operated from one diesel generator can adequately cool the core and maintain the containment pressure within the design value for any loss of coolant incident. The minimum diesel fuel oil inventory is maintained to assure that both diesels can carry the design loads of required engineered safeguards equipment for at least 40 hours, or for one engineered safety feature train for 80 hours, or for operation under hot standby non-accident conditions for 111 hours.[1] Commercial oil supplies and trucking facilities exist to assure deliveries within 8 hours.

The offsite power source consists of separate dedicated 34.5 kV-4160 volt station service transformers served by dedicated 34.5 kV lines (12A transformer with dedicated circuit 751, or 12B transformer with dedicated circuit 767) in operable status. Either offsite source of power can supply all auxiliary loads and transfer can be accomplished within the time constraints of GDC 17. Thus, GDC 17 is explicitly met.

With fuel in the reactor vessel a minimum of one offsite source, one onsite source of AC power and one DC power train are required. The offsite power source may be provided by one of three configurations:

1. Transformer [illegible]A served by a dedicated 34[illegible] kV line (circuit 751), or
2. Transformer 12B served by a dedicated 34.5 kV line (circuit 767), or
3. Backfeed through unit auxiliary transformer 11.

The offsite power source is the preferred source of AC power. Operability of an offsite source requires that one station service transformer served by a dedicated 34.5 kV line is operating and providing power to the unit. The emergency diesel generator provides power upon loss of the offsite source. One emergency diesel generator with 5,000 gallons of fuel can provide power to a minimum level of engineered safeguards equipment for 40 hours (the required safeguards loads at cold shutdown/refueling are significantly less than during power operation). One operable diesel fuel oil transfer pump is required to supply fuel from one of the two fuel storage tanks to the day tank of the operable diesel generator. With less than one offsite and one onsite AC source of power available and one DC power train, no operations involving positive reactivity changes, core alterations, and movement of irradiated fuel shall occur.

Battery chargers with at least 150 amps capacity shall be in service for each battery so that the batteries will always be at full charge. This ensures that adequate dc power will be available.

The plant can be safely shutdown without the use of offsite power since all vital loads (safety systems, instruments, etc.) can be supplied from the emergency diesel generators and the station batteries.

The two diesel generators, each capable of supplying safeguards loads, and the station auxiliary transformers provide four separate sources of power immediately available for operation of these loads. Thus, the power supply meets the single failure criteria.

References

(1) UFSAR - Section 9.5.4

least one source range neutron flux monitor shall be in service.

d. At least one residual heat removal loop shall be in operation.*

e. Immediately before reactor vessel head removal and while loading and unloading fuel from the reactor, the minimum boron concentration of 2000 ppm shall be maintained in the primary coolant system and checked by sampling twice each shift.

f. Direct communication between the control room and the refueling cavity manipulator crane shall be available whenever changes in core geometry are taking place.

g. In addition to the requirements of paragraph 3.8.1.d, while in the refueling mode with less than 23 feet of water above the top of the reactor vessel flange, two residual heat removal loops shall be operable.*

h. During movement of fuel or control rods within the reactor vessel cavity, at least 23 feet of water shall be maintained over the top of the reactor vessel.

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* Either the preferred or the emergency power source may be inoperable for each residual heat removal loop.

4.6 Preferred and Emergency Power Systems Periodic Tests

Applicability

Applies to periodic testing and surveillance requirements of the preferred and emergency power systems.

Objective

To verify that the preferred and emergency power systems will respond promptly and properly when required.

Specification

The following tests and surveillance shall be performed as stated:

4.6.1 Diesel Generators

At least one diesel generator shall be demonstrated operable:

a. During cold or refueling shutdown at least once per 31 days by:
   1. Verifying the diesel starts from normal standby conditions, and attains rated voltage and frequency.

Each diesel generator shall be demonstrated operable:

b. Except during cold or refueling shutdown at least once per 31 days by:
   1. Verifying the fuel level in the day tank.
   2. Verifying a minimum oil storage of 5,000 gallons for each generator is onsite.
   3. Verifying the fuel transfer pump can be started and transfer fuel from the storage system to the day tank.
   4. Verifying the diesel starts from normal standby conditions, and attains rated voltage and frequency.
   5. Verifying the generator is synchronized, loaded to at least 1950 kw but less than the 2 hour rating of 2250 kw and operates for at least 60 minutes but less than 120 minutes.
   6. Verifying the diesel generator is aligned to provide standby power to the associated emergency buses.

c. The tests in Specification 4.6.1b will be performed prior to exceeding cold shutdown if the time since the last test exceeds 31 days.

d. At least once per 92 days by verifying that a sample of diesel fuel from the fuel storage tank is within the acceptable limits specified in Table 1 of ASTM D975-78 when checked for viscosity, water and sediment.

e. At least once per 18 months during shutdown by:

1. Inspecting the diesel in accordance with the manufacturer's recommendations for this class of standby service.

2. Verifying the generator capability to reject a load of 295 KW without tripping.

3. Simulating a loss of offsite power in conjunction with a safety injection test signal and:

(a) Verifying de-energization of the emergency buses and load shedding from the emergency buses.

(b) Verifying the diesel starts from normal standby condition on the auto-start signal, energizes the automatically connected emergency loads with the following maximum breaker closure times after the initial starting signal for Trains A and B not being exceeded

	A	B
Diesel plus Safety Injection Pump plus RHR Pump	20 sec	22 sec
All Breakers	40 sec	42 sec

and operates for ≥ five minutes while its generator is loaded with emergency loads.

(c) Verifying that all diesel generator trips, except engine overspeed, low lube oil pressure, and overcrank, are automatically bypassed upon a safety injection actuation signal.

4. This test may also serve to concurrently meet the requirements of 4.6.1.a and b.

c. At each time data is recorded, new data shall be compared with old to detect signs of deterioration.

d. Each battery shall be subjected to a load test within a twelve-month period from the last load test; however, to permit the load test to coincide with a scheduled refueling, the period may extend for an additional three months. The battery voltage as a function of time shall be monitored to establish that the battery performs as expected during heavy discharge and that all electrical connections are tight.

e. Each battery shall be subject to a discharge test at least once per 60 months. The purpose of this test is to show that the battery capacity is at least 80% of the manufacturer's recommendations. When performed, this discharge test may substitute for the load test.

f. The discharge test shall be performed annually for any battery that shows signs of degradation. Degradation is indicated when the battery capacity drops more than 10% of rated capacity from its average on previous discharge tests, or is below 90% of the manufacturer's rating.

4.6.3 Preferred (Offsite) Power Supplies

Each offsite power source shall be demonstrated operable:

a. At least once per 7 days by:

1. Verifying nominal voltage indications on the high-voltage side of transformers 12A and 12B; and on the 4160 volt buses 12A and 12B.

2. Verifying 4160 volt circuit breakers 12AX or 12BX, AND 12AY or 12BY are open.

3. Verifying tie breakers 52/BT16-14 and 52/BT17-18 are open when plant mode is above 200°F.

b. At least once per 18 months by transferring unit power supply to 4160 volt buses 12A and 12B from the normal circuit, i.e., transformer 12A for bus 12A and transformer 12B for bus 12B to the alternate circuit, i.e., transformer 12B for bus 12A and transformer 12A for bus 12B.

Basis

The tests specified are designed to demonstrate that the diesel generators will provide power for operation of equipment. They also assure that the emergency generator system controls and the control systems for the safeguards equipment will function automatically in the event of a loss of all normal 480V AC station service power.[1]

The test frequency specified will be often enough to identify and correct any mechanical or electrical deficiency before it can result in a system failure. The fuel supply and starting circuits and controls are continuously monitored and any faults are indicated by alarms. An abnormal condition in these systems can be identified without having to test the diesel generators.

Periodic tests are also specified to demonstrate that the offsite power sources will provide power for operation of equipment.

Offsite power source operability requires correct breaker alignment and indicated power availability from the two preferred power circuits, 767 and 751, to the 4160 volt buses. These requirements are met by monitoring nominal voltage indications on the high-voltage side of transformers 12A and 12B; and on the 4160 volt buses 12A and 12B.

Offsite power source independence requires separate 4160 volt circuits supplying power to the 4160 volt buses. Interlocks prevent concurrent closure of 12AX and 12BX, OR 12AY and 12BY; and surveillance is specified to ensure separation is maintained.

Furthermore, to ensure independence between redundant Class 1E 480 volt buses 14 and 18 (Train A) and buses 16 and 17 (Train B), tie breakers 52/BT16-14 and 52/BT17-18 are required to be open when the plant mode is above 200°F. Once tie breakers are open, interlocks prevent closure when independent and redundant buses are energized.

Station batteries may deteriorate with time, but precipitous failure is extremely unlikely. The surveillance specified is that which has been demonstrated over the years to provide an indication of a cell becoming unserviceable long before it fails, and to ensure that the battery capacity is acceptable.

The equalizing charge, as recommended by the manufacturer, is vital to maintaining the ampere-hour capability of the battery. As a check upon the effectiveness of the equalizing charge, the battery should be loaded rather heavily and the voltage monitored as a function of time. If a cell has deteriorated or if a connection is loose, the voltage under load will drop excessively indicating replacement or maintenance.

The minimum permissible on-site fuel inventory, 10,000 gallons, (5,000 gallons for each generator), is sufficient for operation under loss-of-coolant accident conditions of two engineered safety features trains for 40 hours, or for one train for 80 hours, or for operation under hot standby non-accident conditions for 111 hours.[2]

References

(1) UFSAR, Section 8.3

(2) UFSAR, Section 9.5.4

The purpose of this Amendment is to incorporate additional Specifications and Action Statements regarding required operability of the Ginna Station Auxiliary Electrical Systems. In particular, additional Specifications and Action Statements have been added to address the modifications being made to the offsite power system. The reconfiguration will increase the availability margin of the offsite system by dedicating a 34.5kV - 4160 volt transformer to each of the two offsite transmission lines. The detailed changes are listed on Table 1.

Additional requirements have been added including required actions based on reactor coolant system operation above and below cold shutdown, and specific power source operability requirements. Those new power source operability requirements are considered more conservative than previous specifications while also more explicit. During plant startup, all available power sources are required to provide power for engineered safeguards and auxiliary cooling system. The format has been modified to identify separate specifications and actions.

Minor changes have been made to the periodic test requirements for the emergency power supplies. The changes have been made to clarify the diesel generator testing requirements prior to exceeding cold shutdown. This is a conservative change as previously the testing was required for completion prior to exceeding 5% power. Periodic testing requirements to verify operability of the offsite power sources previously unidentified within the Technical Specifications have been added. These testing requirements are consistent with Standard Technical Specifications.

Previously, the offsite power supply from the transmission grid to Ginna Station consisted of two independent 34.5kV transmission lines; each capable of serving a single 4160 volt Station Auxiliary transformer (Unit 12A). Transformer 12A served a dual purpose in that it was used as a startup source and was also a dedicated offsite source for all the Class 1E equipment. The design as it existed was less reliable in that the loss of 12A transformer resulted in the reliance on two onsite diesel generators until such time as the Unit Auxiliary Transformer (Unit 11) could be backfed through the 115kV system. Backfeeding the Unit Auxiliary Transformer is considered a delayed access source and results in the long-term reliance on the diesel generators and the batteries for maintaining safe shutdown loads.

Although the offsite power system met the requirements of all existing licensing commitments, the operating margin could be improved. The modified system provides additional margin by dedicating two independent offsite power sources with separate transformers.

This Technical Specification Amendment addresses specific requirements and actions resulting from the modification, and further defines those time requirements previously unspecified within the Technical Specifications.

Specifications 3.7.1 and 3.7.2 have been created to identify the auxiliary electrical system requirement depending upon reactor coolant system temperature conditions. The specifications proposed identify system temperature requirements more restrictive than those currently existing. This has been done to make them consistent with temperature limitations existing for other safety system operations.

Section 3.7.1 identifies the Specifications and actions to be taken when fuel is in the reactor for AC and DC power. The specifications identify the operability requirements for offsite and emergency power during reduced temperature operations with fuel in the reactor vessel. One (1) onsite, one (1) offsite, and one (1) dc system will be available during periods of operation not covered by Section 3.7.1.

Previous technical specifications identified no specific requirements regarding operation limitations for conditions below power operation including refueling activities. Section 3.7.1.1 and the action specified in Section 3.7.1.2 identify requirements more conservative than the existing requirements. They have been added to provide the operators with clear specifications when less than normal power supplies are available.

The actions specified within Sections 3.7.2.2.a, b and c identify the emergency power operability and plant operations requirements based upon independent offsite power source operability. The plant operation alternatives are progressive with prudent time requirements identified based upon both the potential safety impact of the reduced power availability configuration while allowing some time to make repairs. Allowable times are consistent with Standard Technical Specifications and also consider the safety implications of unwarranted plant cycling. Actions specified in Section 3.7.2.2.b.1 permit operation with one diesel generator inoperable providing the operability of the remaining diesel generator is demonstrated utilizing periodic tests every 24 hours. This configuration is allowed for a period not to exceed seven (7) days in order to permit time to effect repairs. Periodic testing of the remaining diesel generator in this manner versus continuous running provides the assurances of diesel generator operability without the adverse impact of continuously running the diesel generator.

The action specified in Section 3.7.2.2.a allows power operation to continue following the loss of one station service transformer, provided all remaining conditions are met. The preferred (offsite) electrical system reliability with one offsite source available has been proven, as it has existed since original plant licensing. It is also more conservative than existing technical specifications as power operation was previously allowed to continue with no offsite power sources available.

The actions specified within Section 3.7.2.2.d identify the emergency power operability requirements with both offsite power sources inoperable. Prudent maximum out-of-service duration for <u>both</u> offsite sources of 72 hours was chosen to both minimize this mode of operation, while allowing some time to make repairs.

Section 4.6.1 has been modified to require periodic (monthly) diesel generator testing during cold and refueling shutdown modes, consistent with operability requirements for those modes. This change is considered conservative as previously no cold or refueling shutdown testing was required.

Section 4.6.1.d.3(c) has been changed to clarify diesel generator trip testing. RG&E has determined that the words "loss of voltage on the emergency bus and/or safety injection actuation signal" are misleading since there is no bypass of protective trips on loss of voltage. Bypass of protective trips is caused only by SI. The origin of the words "loss of voltage on the emergency bus and/or" are not explicitly known. A description of diesel generator trips and bypasses provided by letter from L.D. White (RG&E) to A. Schwencer (NRC), dated May 16, 1977, makes no mention of an undervoltage bypass. A License Amendment request of November 16, 1977 states that the "Standard Tech Specs published by the NRC have been used as guidance in preparation of the proposed Technical Specification." The current Standard Tech Specs (p. 3/4 8-5) includes the words "loss of voltage on the emergency bus concurrent with a safety injection signal" to verify the automatic bypass feature. RG&E meets this requirement with test procedure RSSP-2.2. There is no technical basis to bypass the "overcurrent" and "reverse power" trips on a loss of voltage to the emergency bus, since this would not be consistent with the accident condition assumption that an SI signal actuation is generated. Unnecessary risk to the diesel generator would be created if these two trips were bypassed in this case. RG&E therefore has deleted the words "loss of voltage on the emergency bus and/or" from Section 4.6.1.d.3(c).

Section 4.6.2.c no longer specifies detecting signs of abuse through the comparison of new and old test data. Abuse, as a cause of deterioration, need not be specified within the plant Technical Specifications.

Section 4.6.3 has been created to address the surveillance requirements for the preferred (offsite) power supplies.

Section 4.6.3.a identifies verifications every 7 days for emergency power capacity and capability from the offsite power supplies. In addition, correct tie breaker alignment verification is specified to ensure independence between the redundant 480 volt safeguards buses. These requirements are consistent with Standard Technical Specifications and more conservative than existing Technical Specifications.

In accordance with 10CFR50.91, these changes to Technical Specifications have been evaluated 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 previously evaluated; or

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

These proposed changes do not increase the probability or consequences of a previously-evaluated accident or create a new or different kind of accident. Furthermore, there is no reduction in the margin of safety for any Technical Specification. The detailed changes are described in Table 1.

Therefore, Rochester Gas and Electric submits that the issues associated with this Amendment request are outside the criteria of 10CFR50.91; and a no significant hazards finding is warranted.

TABLE 1

Change	Effect
1. Table of Contents revised to include Preferred Power System Periodic Tests.	See Section 4.6.
2. Section 3.0.2 Bases states example in 3.7.1.d. New reference example is 3.7.2.1.a. Terminology change from "normal" to "preferred" due to the addition of a second offsite circuit. Footnotes on pages 3.1-3 and 3.8-2 also changed to reflect this. Typographical error in time to cold shutdown requirement of 3.0.1 in example in bases is corrected.	No technical change.
3. Reformat Specifications into Section 3.7.1, Specification - Reactor Coolant System operation with fuel in the reactor vessel and Section 3.7.2, Specifications - Reactor Coolant System Operation above cold shutdown. Appropriate Specification and Action Statements listed within each section.	Minimum requirements for any operation with fuel in the reactor vessel are included in Section 3.7.1. All specifications including actions for operation with the reactor above cold shutdown are included in Section 3.7.2.
4. Proposed Section 3.7.1.1 addresses Electric Power Systems requirements with the with fuel in the reactor vessel. Actions to be taken are in Section 3.7.1.2.	New - additional Technical Specifications. There were previously no electrical power system Technical Specifications or actions applicable to low temperature operations.
5. Section 3.7.2.1 includes the addition of station service transformer 12B with dedicated circuit 767 operable. Two diesel generators are identified independently with required 5,000 gallon fuel supply. 4160 volt buses energized has been deleted. Specification applicability changed from anytime the reactor is critical to anytime RCS temperature is above 350°F for offsite power, and above cold shutdown for emergency sources.	Increased operating availability margin through the addition of requirements for operation requiring additional transformer operability. Increased clarity regarding diesel operability is specified. Applicability of this specification is increased from reactor criticality to anytime RCS is above cold shutdown.

6. Section 3.7.2.2.a similar to existing 3.7.2.a.	Power operation may continue with <u>one</u> station service transformer operable vs. <u>the</u> station service transformer inoperable.
7. Section 3.7.2.2.b addresses diesel generator emergency power operability, time, and action requirements with one independent offsite source operable and/or one diesel generator inoperable.	Comparable to previous Specification 3.7.2.b with increased specificity provided for operability determinations and shutdown requirements. Removed the option of continuous operation of the diesel generators due to the adverse effects of such operation, and to provide increased consistency with Standard Technical Specifications.
8. Section 3.7.2.2.c addresses action requirements with one safety related 480V bus de-energized.	New - addition Technical Specification action requirement. The action requirements are consistent with action requirements of 3.0.6 for loss of a train power system and more stringent than Standard Technical Specification action requirements.
9. Section 3.7.2.2.d addresses emergency power operability and time and action requirements with both independent offsite sources in operable.	New - additional Technical Specification action limiting power operation when offsite power is not available. Based upon Standard Tech. Specs.
10. Section 3.7.2.2.e is similar to previous Section 3.7.2.c.	Minor clarifying word changes are included.
11. Section 4.6 modified to identify periodic tests for preferred (offsite) power system in lieu of emergency power system periodic tests only.	Broader periodic testing requirements to address both emergency and preferred (offsite) power supply operability. Based upon Standard Tech. Specs.
12. Section 4.6.1 modified to add requirement for monthly testing of at least one diesel generator during cold or refueling shutdown.	New - This is an additional surveillance requirement for emergency diesel generator testing during shutdown conditions. Previously there were no shutdown testing requirements for the diesel generators.
13. Section 4.6.1.b.2 oil storage requirements redefined for each diesel generator.	Minor clarifying oil storage requirements per diesel generator.

14. Section 4.6.1.b modified to require testing prior to exceeding cold shutdown in lieu of 5% power.	Increased requirements requiring earlier diesel generator operability periodic testing during startup operations.
15. Specification 4.6.1.d.3A(c) is comparable to previous Specification 4.6.1.d.3(c) except that statement "loss of voltage on the emergency bus and/or" has been deleted.	Clarifies test requirements for automatic bypass of diesel generator trips. Loss of voltage on the emergency bus does not cause an automatic bypass of protective trips.
16. Specification 4.6.1.d.4 allows for satisfying the monthly diesel generator test requirements by performance of the more stringent 18 month requirements	New - This addition Technical Specification is considered more stringent than previous Specifications since previously no monthly testing of the diesel generators was required below 5% power.
17. Section 4.6.3 added to identify periodic test requirements for offsite power.	New - additional Technical Specification. There were previously no periodic test requirements for offsite power sources.