

ATTACHMENT A

Revise the Technical Specification pages as follows:

Remove

5.1-1
Figure 5.1-1

Insert

5.1-1
-

5.0

DESIGN FEATURES

5.1

Site (Deleted)

Amendment No.

5.1-1

Proposed

ATTACHMENT B

INTRODUCTION

The proposed Amendment deletes Technical Specification 5.1 and Figure 5.1-1. The current specification and figure serves no useful purpose nor are they required by the Code of Federal Regulations. The current figure is depicted in Ginna's Updated Final Safety Analysis Report (UFSAR) as Figure 2.1-2. Changes made to the UFSAR are governed in accordance to 10CFR50.71(e).

Duplication of statements which appear in the body of the Technical Specification and Ginna UFSAR only serves to add volume to a discussion. Therefore, the proposed change to remove Specification 5.1 and corresponding Figure 5.1-1 is considered a line-item improvement to the Technical Specifications. Compliance with 10CFR50.36(c)(4) is maintained. Federal Register Volume 52, No. 25, "Proposed Policy Statement on Technical Specification Improvements for Nuclear Power Reactors," dated February 6, 1987 states that:

"The purpose of Technical Specifications is to improve those conditions or limitations upon reactor operation necessary to alleviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety by establishing those conditions of operation which cannot be changed without prior Commission approval and by identifying those features which are of controlling importance to safety.

JUSTIFICATION FOR CHANGE

10CFR50.36(c)(4) provides criteria for inclusion of appropriate material in Section 5 of the Technical Specifications. 10CFR50.36(c)(4) states:

"Design Features to be included are those features of the facility such as materials of construction and geometric arrangements, which, if altered or modified, would have a significant effect on safety and are not covered in categories described in paragraphs (c)(1), (2), and (3) of this section."

Hence, 10CFR50.36(c)(4) does not require that a map or the current site specification should be included in Section 5 of the Technical Specifications. However, NUREG-0133 does suggest, in part, "in preparing proposed {Radiological Effluent} Technical Specifications, Figure 5.1-1 should consist of a map of the site area showing the exclusion boundary, as defined in 10CFR100.3(a) and the unrestricted area boundary, as defined in 10CFR20.3(a)(17)."

The guidelines for this figure are contained in Section 2.1.1 of Regulatory Guide (RG) 1.70 which requests considerable detail, and is more suited for inclusion in Safety Analysis Report (SAR) rather than the Technical Specification.

Regulatory Guide 1.70, Section 2.1.1 requires:

2.1.1 Site Location and Description

2.1.1.1 Specification of Location

The location of each reactor at the site should be specified by latitude and longitude to the nearest second and by Universal Transverse Mercator Coordinates (Zone Number, Northing, and Easting, as found on USGS topographical maps) to the nearest 100 meters. The State and county or other political subdivision in which the site is located should be identified, as well as the location of the site with respect to prominent natural and man-made features such as rivers and lakes.

2.1.1.2 Site* Area Map

A map of the site area of suitable scale (with explanatory text as necessary) should be included. It should clearly show the following:

*"Site" means the contiguous real estate on which nuclear facilities are located and for which one or more licensees has the legal right to control access by individuals and to restrict land use for purposes of limiting the potential doses from radiation or radioactive material during normal operation of the facilities.

1. The plant property lines. The area of plant property in acres should be stated.
2. Location of the site boundary. If the site boundary lines are the same as the plant property lines, this should be stated.
3. The location and orientation of principal plant structures within the site area. Principal structures should be identified as to function (e.g., reactor building, auxiliary building, turbine building).
4. The location of any industrial, commercial, institutional, recreational, or residential structures within the site area.
5. The boundary lines of the plant exclusion area (as defined in 10CFR Part 100). If these boundary lines are the same as the plant property lines, this should be stated. The minimum distance from each reactor to the exclusion area boundary should be shown and specified.
6. A scale that will permit the measurement of distances with reasonable accuracy.

7. True north.
8. Highways, railways, and waterways that traverse or are adjacent to the site.

For Ginna Station, this guidance is met by inclusion of Figures 2.1-1 to 2.1-8 of the UFSAR. Further the proposed change does not alter or modify the Security or Emergency plans. Changes to either the Security or Emergency Plans are governed in accordance with the criteria in 10CFR50.54(p) and (q) respectively. The proposed change allows us to make changes, e.g. site boundary, within specified conditions without prior NRC approval. Proposed changes to UFSAR Figure 2.1-2 are governed pursuant to 10CFR50.71(e). The Radiological Effluent Technical Specifications are unchanged by this proposed change. Therefore, the proposed change will not result in any significant environmental impact.

10CFR50.92 EVALUATION

The proposed change in the Ginna Technical Specifications does not involve a significant hazards consideration. The basis for this determination is as follows:

- There is no significant increase in the probability or consequences of an accident previously evaluated because the accident conditions and assumptions are not affected by the proposed Technical Specification change. The proposed change does not alter or modify the Security or Emergency plans. Changes to either the Security or Emergency plans are governed in accordance with the criteria in 10CFR50.54(p) and (q) respectively. The Radiological Effluent Technical Specifications are unchanged by the proposed Amendment and the change does not alter any assumptions previously made in evaluating the radiological consequences of an accident described in the UFSAR. Therefore, the proposed Amendment does not involve a significant increase in the probability or consequences of any accident previously evaluated.
- The possibility of a new or different kind of accident from any accident previously evaluated is not created. In matters related to nuclear safety, (1) all accidents are bound by previous analyses and (2) the Security and Emergency plans are unchanged by the proposed Amendment. The proposed change does not add or modify any equipment design nor does the proposed change involve any operational changes to any plant system or Limiting Condition for Operation (LCO). The absence of a hardware change or a change in programmatic controls ensures that the accident initiators are unaffected, so no unique accident probability is created.
- The proposed amendment does not involve a significant reduction in the margin of safety as defined in the basis for any Technical Specification (TS) because the results of the accident

analyses which are documented in the UFSAR continue to bound operation under the proposed changes so that there is no safety margin reduction. Additionally, established activities and administrative practices will continue to be conducted in compliance with the Commission's regulations. The purpose of the proposed Amendment is to provide time-saving measures, if deemed necessary. Therefore, the proposed change does not involve a significant reduction in a margin of safety.

CONCLUSION

On the basis of the above, RG&E has determined that the Amendment request does not involve a significant hazards consideration.