



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
SUPPORTING AMENDMENT NO. 49 TO FACILITY OPERATION 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 April 21, 1992, Rochester Gas and Electric Corporation (RG&E) requested an amendment to Facility Operation License No. DPR-18 for the R. E. Ginna Nuclear Power Plant. The proposed amendment would remove requirements for fire detection systems, fire suppression systems, fire barriers, and fire brigade staffing from the Ginna Technical Specifications (TS) and License as recommended by Generic Letter 86-10 of April 24, 1986. The proposed changes would also modify the administrative control requirements of the TS to add requirements for the Fire Protection Program that are similar to requirements for other programs implemented by licensed condition. Guidance on these proposed changes to the TS was provided to all power reactor licensees and applicants by Generic Letter 88-12, dated August 2, 1988.

One typographical error was corrected in the "Table of Contents" Page i, (Section 4.6) in that "Preferred and" was added to the section title, omitted by the licensee's submittal of April 21, 1992. Minor typographical errors to page 3 of the license have also been corrected. These minor typographical corrections do not change the initial proposed no significant hazards consideration determination.

2.0 DISCUSSION

Following the fire at the Browns Ferry Nuclear Power Plant on March 22, 1975, the Nuclear Regulatory Commission (the Commission) undertook a number of actions to ensure that improvements were implemented in the fire protection programs for all power reactor facilities. A number of revisions and alterations occurred in these programs over the years because of the extensive modification of fire protection programs and the number of open issues resulting from staff evaluations. Consequently, licensees were requested by Generic Letter 86-10 to incorporate the final fire protection program in their Final Safety Analysis Reports (FSARs). In this manner, the Fire Protection Program, including the systems, the administrative and technical controls, the organization, and other plant features associated with fire protection, would have a status consistent with that of other plant features described in the FSAR. In addition, the Commission concluded that a standard license condition, requiring compliance with the provisions of the fire protection

program as described in the FSAR, should be used to ensure uniform enforcement of fire protection requirements. The NRC stated that with completion of the requested actions, licensees may request an amendment to delete the fire protection TS, that would be unnecessary.

The licensees for the Callaway and Wolf Creek plants submitted lead-plant proposals to remove fire protection requirements from their TS. This action was an industry effort to obtain NRC guidance on an acceptable format for a license amendment request to remove fire protection requirements from TS. Additionally, in the licensing review of new plants, the staff had approved applicant requests to remove fire protection requirements from the TS issued with the operating license. Thus, on the basis of the lead-plant proposals and the staff's experience with TS for new licenses, Generic Letter 88-12 was issued to provide guidance on removing fire protection requirements from TS.

3.0 EVALUATION

Generic Letter 86-10 recommended the removal of fire protection requirements from the TS. Although a comprehensive fire protection program is essential to plant safety, the basis for this recommendation is that many details of this program that are currently addressed in TS can be modified without affecting nuclear safety. Such modifications can be made provided that there are suitable administrative controls over these changes. These details, which are presently included in the TS and are removed by this amendment, do not constitute performance requirements necessary to ensure safe operation of the facility and, therefore, do not warrant being included in TS. At the same time, suitable administrative controls ensure that there will be careful review and analysis by competent individuals of any changes in the fire protection program including those technical and administrative requirements removed from the TS to ensure that nuclear safety is not adversely affected. These controls include: (1) the TS administrative controls that are applicable to the fire protection program; (2) the license condition on implementation of, and subsequent changes to, the fire protection program; and (3) the 10 CFR 50.59 criteria for evaluating changes to the fire protection program as described in the FSAR.

The specific details relating to fire protection requirements removed from TS by this amendment include those specifications for fire detection systems, fire suppression systems, fire barriers, and fire brigade staffing requirements. The administrative control requirements for the audit responsibilities of the Plant Operations Review Committee have been expanded by the proposed TS modifications to include the review of the fire protection program and implementing procedures and the submittal of recommended program changes to the Chairman of the Nuclear Safety Audit and Review Board. Under the present TS requirements, fire protection program implementation is listed as an activity of the administrative control requirements for which written procedures shall be established, implemented, and maintained.

The TS changes proposed by the licensee are in accordance with the guidance provided by Generic Letter 88-12, as addressed in the items below.

- (1) Specification 6.5.1.6(1) was revised to add the review of the fire protection program and implementing procedures to the administrative responsibilities of the Plant Operations Review Committee.
- (2) The definition of the fire suppression water system, 1.11, was removed since the term is no longer used to specify TS requirements.
- (3) Specification 3.14.1 and Table 3.14-1 on fire detection instrumentation, Specification 4.15.1 on the associated surveillance requirements, and their bases were removed.
- (4) Specifications 3.14.2 through 3.14.7 and Table 3.14-2 on fire suppression systems and fire barriers, Specifications 4.15.2 through 4.15.7 on the associated surveillance requirements, and their bases were removed.
- (5) Specification 6.2.2 (f) on fire brigade staffing was removed.

Consistent with the guidance of Generic Letter 88-12, the licensee committed to update the FSAR to incorporate the fire protection program either by reference or description. This includes those provisions of fire protection requirements that have been removed from the TS as part of this amendment. Also, the licensee has proposed that the existing license condition on fire protection be replaced with the standard license condition provided in Generic Letter 86-10.

On the basis of its review of this matter, the staff concludes that the licensee has met the guidance of Generic Letter 88-12 for the removal of fire protection requirements from the Ginna TS and has proposed the modification of the license to incorporate the standard condition on fire protection. Therefore, the staff finds the proposed license condition and TS changes are acceptable.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the New York State official was notified of the proposed issuance of the amendment. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendment changes surveillance requirements and requirements with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a

proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (57 FR 37572). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed herein, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

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AMENDMENT NO. 49 TO DPR-18 R. E. GINNA NUCLEAR POWER PLANT DATED September 21, 1992

DISTRIBUTION:

Docket File 50-244

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