

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)
)
Rochester Gas and Electric Corporation) Docket No. 50-244
(R.E. Ginna Nuclear Power Plant))

**APPLICATION FOR AMENDMENT
TO OPERATING LICENSE**

Pursuant to Section 50.90 of the regulations of the U.S. Nuclear Regulatory Commission (NRC), Rochester Gas and Electric Corporation (RG&E), holder of Facility Operating License No. DPR-18, hereby requests that the Technical Specifications set forth in Appendix A to that license, be amended. This request for change is to correct various typographical errors within the Technical Specifications.

A description of the amendment request, necessary background information, justification of the requested changes, and no significant hazards and environmental considerations are provided in Attachment I. This evaluation demonstrates that the proposed changes do not involve a significant change in the types or a significant increase in the amounts of effluents or any change in the authorized power level of the facility. The proposed changes also do not involve a significant hazards consideration.

A marked up copy of the Ginna Station Technical Specifications which show the requested changes is set forth in Attachment II. The proposed revised technical specifications are provided in Attachment III.

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WHEREFORE, Applicant respectfully requests that Facility Operating License No. DPR-18, and Attachment A to that license, be amended in the form attached hereto as Attachment III.

Rochester Gas and Electric Corporation

By Robert C. Mecredy
Robert C. Mecredy
Vice President
Nuclear Operations

Subscribed and sworn to before me
on this 8th day of May 1996.

Joanne S. Gorman
Notary Public

JOANNE S. GORMAN
Notary Public in the State of New York
Orleans County
Commission Expires Nov. 19 96

JOANNE S. GORMAN
Notary Public in the State of New York
Olean County
Commission Expires Nov. 19

Attachment I

R.E. Ginna Nuclear Power Plant

License Amendment Request Correction of Typographical Errors

This attachment provides a description of the license amendment request (LAR) and the necessary justifications to support correction of various typographical errors contained within the Ginna Station Technical Specifications. This attachment is divided into six sections as follows. Section A summarizes all changes to the Ginna Station Technical Specifications while Section B provides the background and history associated with the changes being requested. Section C provides the justifications associated with these proposed changes. A no significant hazards consideration evaluation and environmental consideration of the requested changes to the Ginna Station Technical Specifications are provided in Sections D and E, respectively. Section F lists all references used in this attachment.

A. DESCRIPTION OF TECHNICAL SPECIFICATION CHANGES

This LAR proposes to revise the Ginna Station Technical Specifications (TS) to correct several typographical errors. The changes are summarized below and shown in Attachment II. For cross-referencing purposes, the number shown in the box in the left hand margin of Attachment II corresponds to the numbers listed below.

1. Table of Contents
 - i. The title for LCOs 3.3.5 and 3.7.3 are revised to provide consistency with the actual title found within the TS.
 - ii. The page number for LCOs 3.6.4, 3.6.5, 3.6.6, 3.6.7, 3.7.8, 3.7.9, 3.7.10, 3.7.11, 3.7.12, 3.7.13, and 3.7.14 were revised to provide consistency with the actual page these LCOs are found within the TS.
2. LCO 3.2.4
 - i. The extra "increased" in the Completion Time column for Required Action A.6 was deleted. This change is consistent with NUREG-1431 (Reference 1).

3. LCO 3.3.1

- i. The Note for Required Action R.1 was revised to provide consistency with NUREG-1431 (see LCO 3.3.1, Required Action Q.1) and the current bases.
- ii. Several errors in the $f(\Delta I)$ input into the Overtemperature ΔT and Overpower ΔT equations for Table 3.3.1-1 were corrected. These include:
 - a. The " Q_b " in the $f(\Delta I)$ discussion for Overtemperature ΔT was changed to " q_b " based on the equations presented below this text.
 - b. The description of when to set $f(\Delta I) = 0$ was changed to "when $q_t - q_b$ is $\leq +13\%$ RTP" versus when " $> +13\%$ RTP." The error with respect to the \leq sign is obvious since the same "when $q_t - q_b$ is $> +13\%$ RTP" text is used in the next line for when $f(\Delta I)$ must be shifted. The correction of this error is based on the "old" TS, page 2.3-2.
 - c. The last line of the $f(\Delta I)$ description was changed to " $f(\Delta I) = 0.013 \{(q_t - q_b) - 13\}$ " versus " $1.3 \{(q_t - q_b) - 13\}$." The correction of this error is based on the "old" TS, page 2.3-3.

4. LCO 3.3.2

- i. The Note prior to the Surveillance Requirements in LCO 3.3.2 was revised to remove the plural application of "note" and to delete the "1" preceding the note consistent with the NUREG-1431 format for single notes. This change also affects the bases.

5. LCO 3.3.3

- i. The titles of all steam generator (SG) related instrumentation listed in Table 3.3.3-1 were changed since the current wording implies that these are instrumentation to a given SG. As such, the text was revised to reflect that the instrumentation is from a given SG.

6. LCO 3.3.5

- i. The title for Table 3.3.5-1 Function 4 was changed to "Containment Spray - Manual Initiation" versus "Manual Isolation" per Table 3.3.2-1, Function 2.a and the bases for LCO 3.3.5.

B. BACKGROUND

On February 24, 1996, RG&E implemented the Improved Technical Specifications at Ginna Station per Amendment No. 61. Since that time, upon use of the new TS, several typographical errors have been discovered. The majority of these errors are readily evident upon discovery and do not impact any operational activities. However, the errors described above with respect to LCO 3.3.1 could provide confusion and potential incorrect application of the necessary requirement. Therefore, this LAR proposes to correct these errors. Since Ginna Station is currently in a defueled condition in support of the steam generator replacement project, the errors are not currently a problem. However, RG&E expects that Ginna Station will enter MODE 2 conditions on June 2nd at which time, the Overttemperature ΔT and Overpower ΔT reactor trip functions must be OPERABLE. Therefore, the corrections to the f(ΔI) descriptions for these functions must be corrected prior to entering MODE 2. The remaining error within LCO 3.3.1 only applies to specific surveillances of reactor trip functions at power which will not become limiting until several weeks later.

C. JUSTIFICATION OF CHANGES

This section provides the justification for all changes described in Section A above and shown in Attachment II. The justifications are organized based on whether the change is: more restrictive (M), less restrictive (L), administrative (A), or the requirement is relocated (R).

C.1 Administrative

A.1 The proposed changes described in Section A above do not involve any technical issues. Instead, the changes relate to minor errors (e.g., page numbering and titles), providing consistency within the TS (e.g., note formats), correction of equations that were incorrectly translated from the "old" TS, and providing consistency with NUREG-1431. The majority of these errors were introduced during last minute changes to the TS prior to NRC issuance of Amendment No. 61. This is further confirmed in that only one bases page is affected by these changes. Therefore, the correction of these errors is administrative only.

There are not any more restrictive (M), less restrictive (L), or relocated (R) changes associated with this LAR.

D. SIGNIFICANT HAZARDS CONSIDERATION EVALUATION

The proposed changes to the Ginna Station Technical Specifications as identified in Section A and justified in Section C have been evaluated with respect to 10 CFR 50.92(c) and shown to not involve a significant hazards consideration as described below. This section is organized based on Section C above.

D.1 Evaluation of Administrative Changes

The administrative changes discussed in Section C.1 do not involve a significant hazards consideration as discussed below:

1. Operation of Ginna Station in accordance with the proposed changes does not involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed changes only correct various typographical errors within the technical specifications. The errors were discovered during use of the new improved technical specifications and do not involve any technical issues when compared to NUREG-1431 or the "old" technical specifications. As such, these changes are administrative in nature and do not impact initiators or analyzed events or assumed mitigation of accident or transient events. Therefore, these changes do not involve a significant increase in the probability or consequences of an accident previously analyzed.
2. Operation of Ginna Station in accordance with the proposed changes does not create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed changes do not involve a physical alteration of the plant (i.e., no new or different type of equipment will be installed) or changes in the methods governing normal plant operation. The proposed changes will not impose any new or different requirements. Thus, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.
3. Operation of Ginna Station in accordance with the proposed changes does not involve a significant reduction in a margin of safety. The proposed changes will not reduce a margin of plant safety because the changes are administrative in nature. As such, no question of safety is involved, and the change does not involve a significant reduction in a margin of safety.

Based upon the above information, it has been determined that the proposed administrative changes to the Ginna Station Technical Specifications do not involve a significant increase in the probability or consequences of an accident previously evaluated, does not create the possibility of a new or different kind of accident previously evaluated, and does not involve a significant reduction in a margin of safety. Therefore, it is concluded that the proposed changes meet the requirements of 10 CFR 50.92(c) and do not involve a significant hazards consideration.

E. ENVIRONMENTAL CONSIDERATION

RG&E has evaluated the proposed changes and determined that:

1. The changes do not involve a significant hazards consideration as documented in Section D above;
2. The changes do not involve a significant change in the types or significant increase in the amounts of any effluents that may be released offsite since no specifications related to offsite releases are affected; and
3. The changes do not involve a significant increase in individual or cumulative occupational radiation exposure since no new or different type of equipment are required to be installed as a result of this LAR.

Accordingly, the proposed changes meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), an environmental assessment of the proposed changes is not required.

F. REFERENCES

1. NUREG-1431, *Standard Technical Specifications, Westinghouse Plants*, April 1995.

Attachment II

Marked Up Copy of R.E. Ginna Nuclear Power Plant
Technical Specifications

Included Pages:

TOC i
TOC ii
TOC iii
3.2-13
3.3-7
3.3-18
3.3-19
3.3-24
3.3-32
3.3-33
3.3-40
B 3.3-100