



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 65 TO FACILITY OPERATING 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 May 8, 1996, as supplemented May 10, 1996, May 29, 1996, and June 3, 1996, the Rochester Gas and Electric Corporation (the licensee or RG&E) submitted a request for changes to the R. E. Ginna Nuclear Power Plant Technical Specifications (TSs). The requested changes would modify the TS to correct several typographical errors that were implemented in the Improved Technical Specifications (ITS) at Ginna Station per Amendment No 61. The May 10, 1996, May 29, 1996 and June 3, 1996, letters provided clarifying information that did not change the initial proposed no significant hazards consideration determination.

2.0 EVALUATION

The licensee requested changes to 3 pages of the Table of Contents, 8 other changes to the TS and 1 change to the Bases. The proposed changes, along with the staff's evaluation follows:

1. Table of Contents

- i. The title for Limiting Conditions for Operation (LCOs) 3.3.5 and 3.7.3 would be 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 would be revised to provide consistency with the actual page these LCOs are found within the TS.

Since these proposed changes provide consistency between the Table of Contents and the actual sections, the staff has found them to be acceptable.

2. LCO 3.2.4

- i. The extra word "increased" in the Completion Time column for Required Action A.6 would be deleted. This word was inadvertently added and was not consistent with that

recommended by NUREG-1431, Standard Technical Specifications, Westinghouse Plants, April 1995.

Since the proposed change of removing "increased" would provide consistency between NUREG-1431 and the TS and would not change the requirement, the staff has determined that the change is acceptable.

### 3. LCO 3.3.1

- i. The Note for Required Action R.1 would be revised to provide consistency with NUREG-1431 and the current bases and would more clearly define the required action. Since the change would clarify a point of confusion, the staff has determined the proposed change to be acceptable.
- ii. Several errors in the  $f(\Delta I)$  input into the Overtemperature  $\Delta T$  and Overpower  $\Delta T$  equations for Table 3.3.1-1 would be corrected. These include:
  - a. The " $Q_b$ " in the  $f(\Delta I)$  discussion for Overtemperature  $\Delta T$  would be changed to " $q_b$ " based on the equations presented below this text.
  - b. The description of when to set  $f(\Delta I) = 0$  would be changed to "when  $q_t - q_b$  is  $\leq +13\%$  RTP" versus when " $> +13\%$  RTP." The error with respect to the  $\leq$  sign is readily apparent 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 values for certain constants were revised to provide necessary units to ensure that the equation is mathematically correct and consistent with all defined values.

The errors identified above were the results of incorrectly translating the requirements of the "old" TS to the current TS. The proposed changes were reviewed by the staff and since they would retain the technical operating requirements as required by the "old" TS, the staff has found the changes acceptable.

### 4. LCO 3.3.2

- i. The Note prior to the Surveillance Requirements in LCO 3.3.2 would be 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 would also affect a change in the bases (Page B 3.3-100). Since this proposed

change provides clarity, the staff has determined that the proposed change is acceptable.

5. LCO 3.3.3

- i. The titles of all steam generator (SG) related instrumentation listed in Table 3.3.3-1 would be changed since the current wording implies that these are instrumentation to a given SG. As such, the text would be revised to reflect that the instrumentation is from a given SG. Since the proposed change more correctly characterizes the instrumentation, the staff has found the proposed changes to be acceptable.

6. LCO 3.3.5

- i. The title for Table 3.3.5-1 Function 4 would be changed to "Containment Spray - Manual Initiation." The current wording is "Manual Isolation" which is not correct per Table 3.3.2-1, Function 2.a and the bases for LCO 3.3.5. Since this change would provide consistency between Table 3.3.5-1 and Table 3.3.2-1 and corrects an error in the proper identification of the operation of Containment Spray, the staff has determined that the proposed change is acceptable.

3.0 EXIGENT CIRCUMSTANCES

Pursuant to 10 CFR 50.91(a)(6), the licensee requested that the proposed amendment is on an exigent basis. The proposed change would permit the R. E. Ginna Nuclear Power Plant to support a planned entry into MODE 2 on June 4, 1996. The condition that lead to discovery of the need was the result of recent identification by various plant staff personnel of several typographical errors and two errors relating to equations for Overtemperature  $\Delta T$  and Overpower  $\Delta T$  within the ITS issued on February 24, 1996, by Amendment No. 61. The latter errors would provide confusion to the operators by creating an equation in which a specific input is not defined.

Based on the above, the NRC staff has determined that the licensee has used best efforts to make a timely application and that exigent circumstances are present which warrant processing the requested amendment pursuant to 10 CFR 50.91(a)(6).

4.0 FINAL NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The Commission has made a final determination that the amendment involves no significant hazards consideration. Under the Commission's regulations in 10 CFR 50.92, this means that operation of the facility in accordance with the proposed amendment would not (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 from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety.

The Commission has evaluated the proposed changes against the above standards as required by 10 CFR 50.91(a) and has concluded that the changes do not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated.

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 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.

## 5.0 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.



## 6.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes surveillance requirements. 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 made a final finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (61 FR 25966). 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.

## 7.0 CONCLUSION

The Commission has 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, (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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Date: June 3, 1996

