

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 the specified accumulator borated water volume values in SR 3.5.1.2 to match the associated accumulator percent level values.

A description of the amendment request, necessary background information, justification of the requested changes, a 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.

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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.

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 19th day of August 1997.

Deborah A. Piperni  
Notary Public

DEBORAH A. PIPERNI  
Notary Public in the State of New York  
ONTARIO COUNTY  
Commission Expires Nov. 23, 1997

## Attachment I

### R.E. Ginna Nuclear Power Plant

#### License Amendment Request Correction of Accumulator Borated Water Volume (SR 3.5.1.2)

This attachment provides a description of the license amendment request (LAR) and the necessary justifications to support correction of the accumulator borated water volumes specified in SR 3.5.1.2. This attachment is divided into six sections as follows. Section A summarizes all changes to the Ginna Station Improved Technical Specifications (ITS) 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 ITS as summarized below and shown in Attachment II.

##### 1. LCO 3.5.1

SR 3.5.1.2 is revised to correct the specified accumulator borated water volume values in order to match with the associated accumulator percent level values.

#### B. BACKGROUND

On February 13, 1996, the NRC issued Amendment No. 61 to the Ginna Station technical specifications. This amendment replaced the existing Ginna Station technical specifications in their entirety with ITS that were based on NUREG-1431. Included within the ITS was the addition of specific accumulator borated water volumes to match with the existing accumulator percent level values. That is, the previous technical specifications already required an accumulator inventory based on percent level. The water volumes in cubic feet that were added to SR 3.5.2.1 were intended to be the same accumulator inventories and were those called out in the accident analyses. However, as identified in RG&E Action Report 97-0960, it has since been determined that the water volumes as specified in the ITS do not correctly match up with the percent level values. This was due to an error in the accumulator wall thickness used in the calculation.

To ensure continued compliance with the existing SR 3.5.2.1 requirements, RG&E is currently maintaining RWST level between 67% and 82% level (versus the specified 50% to 82% level). This band was determined based on meeting the most limiting of the specified cubic feet and percent level values. RG&E and Westinghouse have since re-evaluated the affected accident analyses (e.g., small and large LOCA and steam line breaks) using the correct cubic feet values with respect to the 50% and 82% levels as specified in SR 3.5.2.1 and determined a negligible change results (i.e., the results are acceptable). It should be noted that as described on ITS bases page B 3.5-4, only a nominal accumulator level is used in the accident analysis due to competing effects of higher versus lower levels. That is, the accident analysis does not use the upper and lower accumulator volumes, only an average.

Consequently, the purpose of this LAR is to correct the conversion error. No modifications are required in order to implement this LAR.

### 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). The justifications listed below are also referenced in the technical specification(s) which are affected (see Attachment II). It is noted that there are only administrative changes associated with this LAR.

#### C.1 Administrative

1. The accumulator borated water volume in cubic feet is corrected in order to match with the specified accumulator percent level in SR 3.5.2.1. This change is required to correct an error that was caused by using an incorrect accumulator wall thickness. The affected accident analyses (e.g., small and large LOCA and steam line breaks) have been re-evaluated by RG&E and Westinghouse using the correct cubic feet values with respect to the 50% and 82% levels. The results indicate that there was a negligible change such that all requirements with respect to the emergency core cooling system remain met (e.g., 10CFR50, Appendix K).

There are not less restrictive (L), more restrictive (M), 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 change is only to correct a conversion error with respect to accumulator borated water volume. This does not increase the probability of any accident previously evaluated since the accumulator water volume provides mitigation capability only (i.e., does not initiate any accident). The affected accident analyses with respect to the accumulator (e.g., small and large LOCA and steam line break) have been re-evaluated using the correct accumulator water volume values with acceptable results. 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. Ginna Station operators verify accumulator water volume via percent level (versus cubic feet) which remains unchanged. 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 only correct a conversion error. The error has been re-evaluated with acceptable results. 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 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

None.



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