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See Proposed Change To Tech Specs.

SUBJECT: Application for amend to license DPR-18, proposing TS 3.5, providing NRC w/opportunity to communicate at early stage any concerns w/respect to differences from NUREG-1431.

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Vice President
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July 15, 1994

U.S. Nuclear Regulatory Commission
Document Control Desk
Attn: Allen R. Johnson
Project Directorate I-3
Washington, D.C. 20555

Subject: Application for Amendment to Facility Operating License
Proposed Improved Technical Specification Section 3.5
Rochester Gas & Electric Corporation
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

- References:
- a. NUREG-1431, "Standard Technical Specifications, Westinghouse Plants," September 1992.
 - b. Letter from R.C. Mecredy, RG&E, to A.R. Johnson, NRC, Subject: "Conversion to Improved Technical Specifications," dated February 28, 1994.

Dear Mr. Johnson,

Enclosed please find the proposed new Technical Specification (TS) 3.5 which is based on the Improved Technical Specifications (ITS) contained in NUREG-1431 (Ref. a). This new specification is the first section which was produced by the Ginna Station Technical Specification Improvement Program (TSIP) as outlined in Reference b. The purpose of sending this proposed specification is to provide the NRC with the opportunity to communicate at an early stage any concerns with respect to differences from NUREG-1431. As such, formal approval of the proposed specification is not requested at this time. Approval will be requested when the entire new TS are submitted in the spring of 1995.

The new TS 3.5 consolidates all current requirements related to the Emergency Core Cooling System (ECCS) into one section. In addition, several new requirements contained in NUREG-1431 are added to provide a more complete specification. Consistent with Reference b, the main purpose of the TSIP is to convert the existing Ginna Station TS requirements into the ITS format and only add new requirements considered necessary to provide a more complete specification. A breakdown of the additional requirements contained in NUREG-1431 related to the ECCS is provided below:

- a. Surveillance Requirements (SRs) Not Added: 5
- b. Limiting Conditions For Operation (LCO) Not Added: 2
- c. SRs Added: 8
- d. LCOs Added: 1

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The new TS 3.5 is being provided in the format that will be used for the submittal of the License Amendment Request (LAR) related to entire new TS. This is being done to help prevent any confusion which may result when all TS requirements are converted to the ITS format and submitted as one package in 1995. Therefore, only the sections of the LAR related to TS 3.5 are being submitted at this time. It should be noted that while RG&E believes that the enclosed TS 3.5 is complete, it may be revised prior to the submittal of the entire new TS based on NRC comments or conversion of the remaining sections.

The next TS section will be provided to the NRC in approximately 3 weeks. Therefore, RG&E requests that any NRC questions or comments be provided within this time frame to support the schedule for conversion to ITS. To facilitate the resolution of any NRC concerns, please direct any comments to either Mark Flaherty at (716) 724-8512 or George Wrobel at (716) 724-8070.

Very truly yours,


Robert C. Mecredy

MDF\620

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Attachment A

R.E. Ginna Nuclear Power Plant

License Amendment Request Conversion to Improved Technical Specifications

This attachment provides a description of the amendment request and necessary justification for the proposed changes. The attachment is divided into seven sections as follows. Section A identifies all changes to the current Ginna Station Technical Specifications while Section B provides the background and history associated with the changes being requested. Section C provides detailed justification for the proposed changes including a comparison to Improved Technical Specifications as applicable. A safety evaluation, significant hazards consideration evaluation, and environmental consideration of the requested changes are provided in Sections D, E, and F, respectively. Section G lists all references used in this attachment.

A. DESCRIPTION OF AMENDMENT REQUEST

This License Amendment Request (LAR) proposes to revise Ginna Station Technical Specifications as summarized below. Attachment B contains a marked up copy of the current Ginna Station Technical Specifications showing the requested changes. The Technical Specifications following the proposed changes is provided in Attachment C. Note that format issues and minor wording changes are excluded from the discussion below:

1. Technical Specification Table of Contents
 - i. Revised to support proposed changes.
2. Technical Specification 1.0
 - i. TS 1.12 was revised to change the definition of refueling frequency from 18 months to 24 months for non-instrumentation related components.
14. Technical Specification 3.3
 - i. TS 3.3.1.1.a and 3.3.1.2 were revised to allow 8 hours (instead of 1) to restore RWST boron concentration within limits. An upper RWST boron concentration limit was also added.

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- ii. TS 3.3.1.1.b and 3.3.1.3 were revised to allow 72 hours (instead of 1) to restore accumulator boron concentration within limits. The exemption related to isolating the accumulators during RCS hydro tests was also deleted. An upper accumulator boron concentration limit was also added.
- iii. TS 3.3.1.1.c was revised to allow both SI pump flow paths to be isolated for up to 2 hours to perform pressure isolation valve testing. Also, an additional 4 hours (or until RCS temperature exceeded 375°F) is now allowed to place into service an SI pump declared inoperable due to LTOP considerations upon entering MODE 3.
- iv. TS 3.3.1.1.g was revised to require that motor operated isolation valves 851A and 851B be maintained open with AC power removed.
- v. TS 3.3.1.5.d was revised to only allow isolation valves 878A, 878B, 878C, and 878D to have power installed during pressure isolation valve testing in MODE 3. Isolation valves 896A, 896B, and 856 must now have power removed above MODE 3.

29. Technical Specification 4.1

- i. The following new requirements were added:
 - a. Verification every 12 hours of the upper limit for the nitrogen pressure blanket in the accumulators.

30. Technical Specification 4.2

- i. The following new requirements were added:
 - a. Verification every 12 hours that each accumulator motor operated isolation valve is fully open when RCS pressure is > 1600 psig.
 - b. Verification every 31 days that power is removed from the accumulator motor operated isolation valves when RCS pressure is > 1600 psig.
 - c. Verification every 12 hours of the upper limit for boron concentration in the RWST.
 - d. Verification every 12 hours of the upper limit for boron concentration in the accumulators.



33. Technical Specification 4.5

- i. TS 4.5.1.1.a was revised to require testing of the SI pumps with respect to an SI signal only every 24 months.
- ii. TS 4.5.2.1 was revised to relocate all SI, RHR, and Containment Spray pump testing frequencies and discharge pressure requirements to the IST program.
- iii. TS 4.5.2.2.c was deleted.
- iv. The following new requirements were added:
 - a. Verification every 12 hours that ECCS related isolation valves are in their required position.
 - b. Verification every 31 days that ECCS related valves which are not locked, sealed, or otherwise secured in position are in their correct position.

B. BACKGROUND

Not provided at this time.



C. JUSTIFICATION

Converting to the ITS format will provide a significant human factors improvement by locating similar requirements within the same section and also provide a standard structure. In addition, the expanded bases information will support preparation of safety evaluations and training activities. There are several types of changes that are being requested by this LAR in order to perform the conversion. These changes are with respect to both the ITS and the current Ginna Station Technical Specifications. The technical and significant administrative changes are organized into multiple categories as summarized below.

1. ITS Changes

i. ITS Requirements Not Added Or Significantly Changed

Several NUREG-1431 requirements were not added to the proposed new technical specifications or were significantly revised based on issues specific to Ginna Station. These issues include both design and cost considerations and existing TS requirements.

ii. Retained Requirements Not In ITS

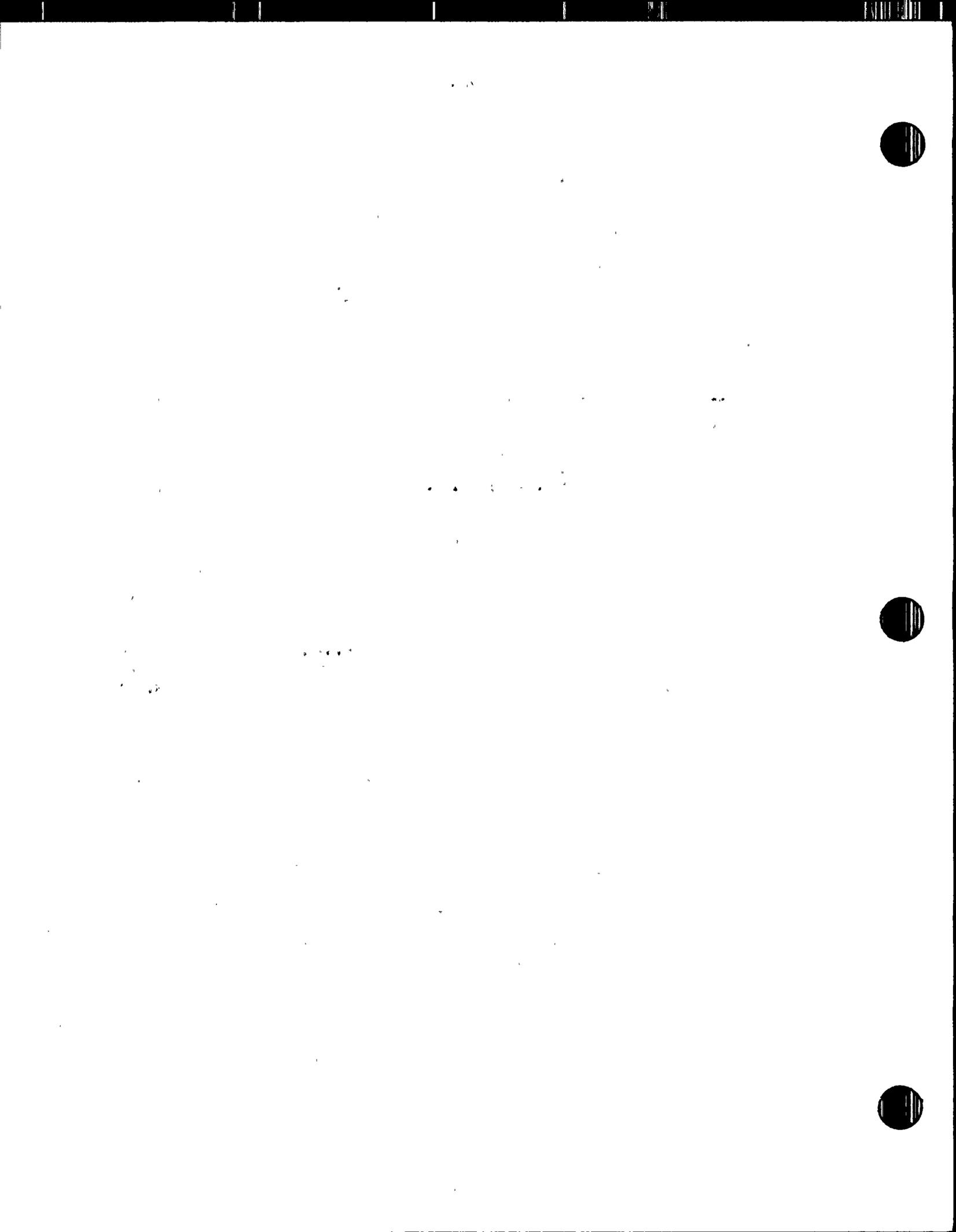
The Ginna Station Technical Specifications contain several requirements not specified within NUREG-1431 that meet the criterion found in the NRC Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors. These requirements typically pertain to systems or design features unique to Ginna Station. In addition, there are several requirements which RG&E has elected to maintain within technical specifications.

iii. Other Changes to ITS (Technical)

Several changes were made to the ITS provided in NUREG-1431 to provide consistency between chapters and sections. These changes are typically minor but may involve the addition of new requirements (e.g., entry into LCO 3.0.3).

iv. Other Changes to ITS (Administrative)

Several minor changes to the ITS were made due to design considerations (e.g., two reactor coolant loops versus four). These changes were mainly performed to the bases and are minor revisions only and do not involve any technical issues.



2. Ginna Station Technical Specification Changes

i. Relocation of Requirements Within Technical Specifications

Many current specifications are moved to support consolidation of similar requirements within the same section. Since the requirements are only being relocated within the technical specifications, there is no reduction in safety. This category is mainly used to identify multiple requirements that are consolidated into a single new specification and not for listing requirements which are only renumbered.

ii. Elimination of Duplicated Regulatory Requirements

Several specifications currently duplicate existing regulatory requirements. The removal of these specifications eliminates the need to change technical specifications when there are rule changes. Since all licensees must meet the applicable requirements contained in the Code of Federal Regulations, or have NRC approved exemptions, there are sufficient regulatory controls in place to allow elimination of duplicated requirements from technical specifications. The implementation of these requirements are contained in procedures and other licensee controlled documents.

iii. Relocation of Current Requirements To Other Controlled Documents

The relocation of certain requirements to other licensee controlled documents (i.e., UFSAR, QA Program, and plant procedures) does not eliminate the requirement. Instead, the requirements are relocated to other more appropriate documents and programs which have sufficient controls in place to manage implementation and future changes (e.g., 10 CFR 50.54(a)(3) and 10 CFR 50.59). The relocation of these items will enable RG&E to more efficiently maintain the requirements under existing regulations and reduce the need to request technical specification changes for issues which do not affect public safety.

iv. Addition of New ITS Requirements

There are several requirements contained in NUREG-1431 which are not currently in the Ginna Station Technical Specifications. These ITS requirements were added in order to provide a more complete specification.



v. Other Changes to Technical Specifications (Technical)

Several changes to existing requirements were made to provide consistency with NUREG-1431. Examples include moving requirements to LCO Notes and revising the specified Completion Time. Also included within this category are the revision of the existing bases to reflect more current information.

vi. Other Changes to Technical Specifications (Administrative)

Several minor changes to the technical specifications were made that are minor revisions only and do not involve any technical issues. Examples include updates of references to the Code of Federal Regulations.

The technical and significant administrative changes to both the ITS and current Ginna Station Technical Specifications, and the basis for these changes, are summarized below. Requirements contained within the current Ginna Station Technical Specifications are identified as "TS"; within the proposed final Ginna Station Technical Specifications (i.e., Attachment C) as "new TS"; and within NUREG-1431 as "ITS", "LCO", or "SR" as appropriate.

The changes to the ITS are discussed first. The section is organized based on the ITS chapter numbers to facilitate easier review. Each change is also identified with respect to one of the above categories (e.g., ITS Category (i) change). Since the conversion is mainly based on the ITS for Westinghouse plants, a marked up copy of NUREG-1431 is provided in Attachment D. A cross reference is provided in the margin of each ITS specification that has been changed by use of a circle containing section numbers from below. For example, "1.i" found in the margin of the ITS markup would refer to section 1.i below. This cross reference is not used for the plant-specific values provided in brackets ([]) in the ITS since these values were typically taken from the existing Ginna Station Technical Specifications.

C.1 ITS Changes

1. ITS 1.1

i.

51. ITS 3.5.1

i. SR 3.5.1.1 and 3.5.1.5 were revised to specify "motor operated" isolation valve consistent with the bases. This is an ITS Category (iv) change.

ii. SR 3.5.1.2 was revised to require a verification of accumulator volume with respect to cubic feet instead of gallons. The current bases for Ginna Station TS 3.3.1.1 specify a volume in cubic feet which is more familiar to plant operators. There is no technical difference between specifying a volume in cubic feet or gallons. This is an ITS Category (iv) change.

iii. SR 3.5.1.4 was revised to only require verification of accumulator boron concentration on a staggered monthly basis consistent with the current testing frequency (TS Table 4.1-2, #14). This is a ITS Category (i) change. In addition, verification of boron concentration within 6 hours following an increase due to RCS inleakage was not added. The accumulator is normally maintained at 2000 ppm since it is filled from the RWST. The worst case scenario for inleakage is based on an initial accumulator volume of 1120 ft³ (50%). Assuming that the isolation check valves leaked sufficiently to fill the accumulators to the upper limit of 1190 ft³ (82%), a total of 70 ft³ of water is added. If this water contains 0 ppm boron concentration, the resulting accumulator boron concentration is only 1880 ppm which is above the 1800 ppm minimum limit. Therefore, this requirement is not considered necessary. This is an ITS Category (i) change.

iv. The bases were revised as follows (these are ITS Category (iv) changes):

- a. Plant-specific background information with respect to accumulator volume, pressure, and boron concentration was added. This includes revising the bases and LCO action statements to reflect that Ginna Station only has two accumulators instead of the four listed in ITS.
- b. The basis for locking open the accumulator motor-operated isolation valves was revised to reflect actual system design.
- c. The discussion of instrument uncertainty with respect to the accumulator water volume was removed since instrument uncertainty is not discussed for any other accumulator parameter.
- d. The discussion of the accumulator maximum boron concentration limit was revised based on issues specific to the Ginna Station design. In addition, the basis for selecting the actual limit was added since this is a new requirement.
- e. Various wording changes were made to improve the readability and understanding of the bases and to reflect plant-specific considerations.
- f. The basis for SR 3.5.1.5 was changed to remove reference to a single failure coincident with the LOCA since there is no active single failure which would prevent injection from the operable accumulator. Instead, a LOCA in the cold leg containing the operable accumulator would prevent injection. In addition, the discussion with respect to providing operator flexibility for removing AC power to the motor operated isolation valves was deleted since this does not apply to Ginna Station.

v. Incorporation of approved Traveller WOG-10, C.1.

vi. Incorporation of approved Traveller WOG-28, C.1.

52. ITS 3.5.2

- i. A new action statement was added requiring immediate entry into LCO 3.0.3 if both trains of ECCS are inoperable. Supporting bases information was also added. This change provides consistency with other similar specifications related to redundant trains or components (e.g., ITS 3.5.1). This is an ITS Category (iii) change.

- ii. SR 3.5.2.1 was revised to delete the requirement for verifying that power to the listed valve operators was removed. These isolation valves are maintained in their positions by administrative control. All manipulations and maintenance activities associated with these valves requires independent verification of the valve position and breaker or DC control power status prior to declaring it operable. Also, the verification of the breaker status for several valves requires entry into electrical bus cubicles which has the potential for reactor trips or other undesirable consequences. Verification every 12 hours that a valve is in its listed position provides appropriate controls to ensure that the valve has not been changed without operations knowledge. A check of the breaker and DC control power status will be performed during the performance of SR 3.5.2.3. This surveillance interval is consistent with SR 3.5.1.5. It should be noted that the Ginna Station TS currently do not require either SR 3.5.2.1 SR 3.5.2.2, or SR 3.5.2.3. This is an ITS Category (i) change.
- iii. SR 3.5.2.3 was not added since this requirement is not currently contained within the Ginna Station TS and is not considered necessary to ensure operability of the ECCS systems. The periodic testing of the ECCS systems in accordance with the IST program provides sufficient means to eliminate the most likely gas accumulation scenarios. This is an ITS Category (i) change.
- iv. SR 3.5.2.7 was not added since the ECCS systems at Ginna Station do not utilize any valves in a throttled position for flow distribution. Instead, flow distribution is performed by air operated valves or by the design and resistance of the installed system. This is an ITS Category (i) change.
- v. SR 3.5.2.8 was not added since visual inspection of the ECCS train containment sump inlet and trash screens is not currently contained within the Ginna Station TS and this surveillance is considered a housekeeping activity. Also, other systems utilize screens to prevent inadvertent addition of foreign materials (e.g., Service Water) without any similar surveillance requirement. This is an ITS Category (i) change.



- vi. The bases were revised as follows (these are ITS Category (iv) changes):
- a. Plant-specific background information with respect to the ECCS design was added. This includes revising the bases and LCO action statements to reflect that Ginna Station only has two trains of ECCS, specification of Containment Sump B, and greater details concerning the operation of the SI and RHR systems during both injection and recirculation.
 - b. The basis and Note 2 were revised to reflect that the charging system at Ginna Station does not perform an ECCS function. The charging system is used to control RCS inventory and chemistry conditions and provide reactor coolant pump seal injection. The pumps are stripped from the safeguards buses upon ESFAS actuation and are not credited in any UFSAR Chapter 15 analysis with respect to an ECCS function. For small break LOCAs which do not initially depressurize RCS sufficiently below the SI pump shutoff head, AFW is used to provide core cooling. After RCS pressure drops to approximately 1500 psig, the SI pumps provide the necessary high-head injection capability.
 - c. Ginna Station was designed and built prior to the issuance of the GDC contained in 10 CFR 50, Appendix A. However, the draft GDC issued by the Atomic Industrial Forum (AIF) in 1967 were utilized in the design of Ginna Station. The bases were revised to reflect this difference.
 - d. A discussion concerning MODE 4 core cooling requirements was added to the Applicability section for consistency since MODES 1, 2, 3, 5, and 6 were discussed.
 - e. Various wording changes were made to improve the readability and understanding of the bases.
 - f. Deleted Reference 6 since this Information Notice does not apply to the design of the ECCS at Ginna Station.
- vii. The Applicability note for LCO 3.5.2 was revised to allow the SI motor operated isolation valves to have power restored for up to 12 hours to perform pressure isolation valve testing provided that only one valve was energized at a time. This is consistent with Ginna Station TS 3.3.2.d and is an ITS Category (ii) change.
- viii. The listing of valves for SR 3.5.2.1 was generated from current Ginna Station TS 3.3.1.1.g and 3.3.1.1.j. See also Section C.2, 13.viii.
- ix. Incorporation of approved Traveller NRC-03, C.9.

53. ITS 3.5.3

- i. SR 3.5.2.1 and new SR 3.5.2.3 were not added during MODE 4 conditions. The ITS bases state that a single failure does not need to be considered during this mode of operation and that sufficient time exists for manual actuation of ECCS and operator action. Since the bases for SR 3.5.2.1 and new SR 3.5.2.3 state that these surveillances are performed to address single failures and inadvertent misalignment of valves, verification of valve and breaker position is not considered necessary during MODE 4. This is an ITS Category (i) change.
- ii. Plant-specific background information with respect to the ECCS design was added. This includes revising the bases and LCO action statements to provide greater details concerning the operation of the SI and RHR systems. These are ITS Category (iv) changes.

54. ITS 3.5.4

- i. SR 3.5.4.1 and the second part of LCO 3.5.4.A was not added. The RWST for Ginna Station is located within the Auxiliary Building and is not subject to temperature extremes which would require an action statement and surveillance requirement. LCO 3.5.4.B was also revised and additional information was added to the Bases to reflect this design consideration. This is a ITS Category (i) change.
- ii. The bases were revised as follows (these are ITS Category (iv) changes):
 - a. Discussions related to non-TS related functions of the RWST were deleted. This type of information is contained in the UFSAR, procedures, and other more appropriate documents.
 - b. Plant-specific background information with respect to the design of the RWST including the suction and recirculation lines for the ECCS and Containment Spray System pumps was added. This includes revising the bases to reflect that Ginna Station does not use the safety injection pumps as a source of normal charging.
 - c. The discussion of the RWST maximum boron concentration limit was expanded to discuss the basis for selecting the actual limit since this is a new requirement.
 - d. Various wording changes were made to improve the readability and understanding of the bases and to reflect plant-specific considerations.
- iii. Incorporation of approved Traveller WOG-10, C.2.

iv. Action C was revised for LCO 3.5.4 to reference both Conditions A and B. This is consistent with other NUREG-1431 requirements containing multiple Conditions. This is an ITS Category (iii) change.

55. ITS 3.5.5

i. This section and associated bases were not added. The ITS bases state that "this LCO is applicable only to those units that utilize the centrifugal charging pumps for safety injection." Ginna Station utilizes a separate charging system from the safety injection system (UFSAR Chapter 9.3.4). Therefore, this requirement is not relevant to the existing design. This is an ITS Category (i) change.

56. ITS 3.5.6

i. This section and associated bases were not added. The Boric Acid Storage Tanks (BASTs) no longer provide a function with respect to emergency core cooling and were removed from technical specifications by Reference 5. See ITS 3.1 for discussion with respect to the function provided by the BASTs for maintaining RCS boron concentration. This is an ITS Category (i) change.



The following section discusses changes to the current Ginna Station Technical Specifications which were not addressed above. This section is organized based on the existing TS chapter numbers to facilitate easier review. Each change is also identified with respect to one of the above categories (e.g., Ginna Station TS Change Category i). A marked up copy of the Ginna Station Technical Specifications is provided in Attachment B which identifies major changes only. A cross reference is provided in the margin of each specification that has been changed by use of a circle containing section numbers from below. For example, "1.i" found in the margin of the markup would refer to section 1.i below. A cross reference between the ITS and current Ginna Station Technical Specifications is also provided in Attachment E.

C.2 Ginna Station Technical Specification Changes

1. Technical Specification 1.0

- i. TS 1.12 - This was revised to change the definition of refueling frequency from 18 months to 24 months. This change does not apply to ITS Section 3.3 (Instrumentation) which will remain at 18 months. Generic Letter 91-04 (Ref. 11) allows changes in the technical specification surveillance intervals for hardware related components provided that the effect on safety is small and supported by historical maintenance and surveillance data. Ginna Station currently has an extensive reliability centered maintenance (RCM) program which is used to optimize equipment testing practices and frequencies. In addition, the new Maintenance Rule, 10 CFR 50.65, requires monitoring of equipment availability and reliability. Therefore, sufficient controls are in place to support this change.

13. Technical Specification 3.3

- i. TS 3.3.1.1.b and 3.3.1.3 - LCO 3.5.1.A was added which allows 72 hours to restore accumulator boron concentration to within acceptable limits. The ITS bases state that allowing a longer period of time to correct boron concentration is acceptable since the volume of water in the accumulators is the critical feature. Attempting to correct boron concentration within the current 1 hour limit would create a significant burden on the operations staff. Therefore, the current 1 hour LCO was only maintained for accumulator pressure and volume. This is a Ginna TS Category (v) change.



- ii. TS 3.3.1.1.a and 3.3.1.2 - LCO 3.5.4.A was added which allows 8 hours to restore the RWST boron concentration to within acceptable limits. The ITS bases state that allowing a longer period of time to correct boron concentration is acceptable since it requires a longer period of time to perform this type of adjustment due to the large volume of water contained within the RWST. This is a Ginna TS Category (v) change.
- iii. TS 3.3.1.1.c - Two notes associated with LCO 3.5.2 were added. The first note allows both SI pump flow paths to be isolated for up to 2 hours to perform pressure isolation valve testing. The ITS bases state that this is acceptable since the isolation valves can be opened from the control room. The second note allows up to 4 hours, or until the RCS cold legs exceed 375°F, to place into service ECCS pumps declared inoperable due to LTOP considerations. This note was added since the LTOP setpoint of 330°F is very close to the Mode 3 definition of $\geq 350^\circ\text{F}$. As described in the ITS bases, this note provides operator flexibility to restore the inoperable pump to operable status. These are Ginna TS Category (v) changes.
- iv. TS 3.3.1.5.d - This was revised and used as a note for LCO 3.5.2. The specification now only allows 878A, 878B, 878C, and 878D to have power installed during Mode 3 for the specific purpose of performing pressure isolation valve testing. Isolation valves 896A, 896B and 856 must now have DC power removed above MODE 3 or both trains of ECCS will be declared inoperable. This change was made since there is no regularly scheduled testing of 896A, 896B, and 856 above 350°F. This is a Ginna TS Category (v) change.
- v. LCO 3.5.3 was added which requires one train of SI and RHR during MODE 4. This new requirement is being added to address low probability accidents which may occur during this mode of operation. This is a Ginna TS Category (iv) change.
- vi. TS 3.3.1.1.b - The current exception for not requiring the accumulators during hydro tests was not added to the new technical specifications. These hydro tests are performed with RCS temperatures below MODE 3 conditions (i.e., $< 350^\circ\text{F}$). Since the new specification only requires the accumulators when RCS pressure is > 1600 psig during MODE 3, this exception is no longer required. This is a Ginna TS Category (vi) change.



- vii. TS 3.3.1.1.b - The bases for TS 3.3 were revised to update the specified water volume contained in the accumulator with respect to the 50% and 82% levels. The required levels specified in TS 3.3.1.1.b have not been changed, only the corresponding water volumes provided in the bases. The new values are consistent with those used in the accident analysis. This is a Ginna TS Category (v) change.
- viii. TS 3.3.1.1.g - Motor operated isolation valves 851A and 851B were added to new SR 3.5.2.1 since these valves must remain open with AC power removed to ensure the availability of Containment Sump B to the RHR system following a LOCA. The addition of these valves is a conservative change. This is a Ginna TS Category (v) change.

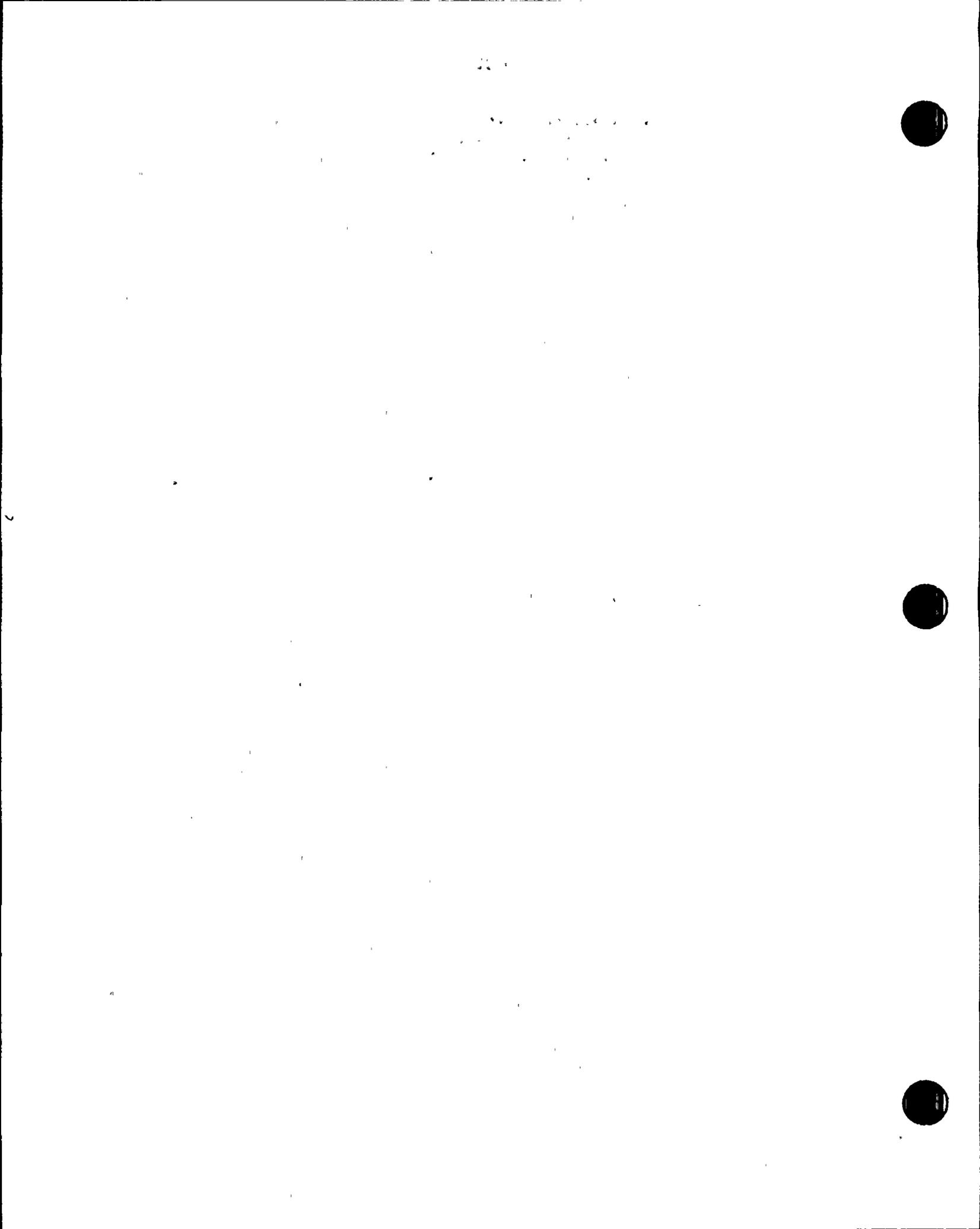
28. Technical Specification 4.1

- i. TS 4.1.1 and Table 4.1-1 was revised to include the following new requirements (Ginna TS Category (iv) change):
 - a. SR 3.5.1.3 - requires verification of an upper limit for the nitrogen pressure blanket in the accumulators to prevent lifting of the relief valve and overpressurization of the tank. A value of 790 psig was selected since it is above the accumulator pressure upper alarm setpoint of 760 psig and below the relief valve setpoint of 800 psig.
- ii. TS 4.1.2 and Tables 4.1-2 and 4.1-4 were revised to include the following new requirements (Ginna TS Category (iv) change):
 - a. SR 3.5.1.1 - requires verification every 12 hours that each accumulator motor-operated isolation valve is fully open above 1600 psig.
 - b. SR 3.5.1.4 - requires verification of an upper limit for boron concentration in the accumulator since this limit is used in determining the time frame which boron precipitation is addressed post LOCA. A value of 2,900 ppm was selected since this would not create the potential for boron precipitation in the accumulator assuming a containment (and accumulator) temperature of 60°F. This is also bounded by the containment sump pH calculations and assumptions used for chemical spray effects.

- c. SR 3.5.1.5 - requires verification every 31 days that power is removed from the accumulator isolation valve operator above 1600 psig. This surveillance is consistent with current TS 3.3.1.1.i. A value of 1600 psig was selected (i.e., the same value as that for accumulator operability) since the RCS pressure interlock (i.e., P-11) as discussed in NUREG-1431 does not exist at Ginna Station. Therefore, there is no interlock signal to open the isolation valves in the event that they are closed.
- d. SR 3.5.4.2 - requires verification of an upper limit for boron concentration in the RWST since this limit is used in determining the time frame which boron precipitation is addressed post LOCA. A value of 2,900 ppm was selected since this would not create the potential for boron precipitation in the RWST assuming an Auxiliary Building (and RWST) temperature of 50°F. This is also bounded by the containment sump pH calculations and assumptions used for chemical spray effects.

32. Technical Specification 4.5

- i. TS 4.5.1.1.a - This was revised to require testing of the SI pumps with respect to an SI signal only every 24 months. The SI pumps currently are tested for a concurrent SI and loss-of-offsite power (LOOP) condition per TS 4.6.1.e. This is a Ginna TS Category (iv) change.
- ii. TS 4.5.2.1 - This was revised to relocate all SI, RHR, and Containment Spray pump testing frequencies and discharge pressure requirements to the IST program consistent with the ITS. Testing of the SI and RHR pumps will also be required in MODE 4. These are Ginna TS Category (iii) and (iv) changes, respectively.
- iii. TS 4.5.2.2.c - The test related to accumulator check valve testing for operability every refueling shutdown was deleted. These check valves are currently in the Ginna Station IST program and are partially stroke tested quarterly and refurbished every six years. Leakage associated with these check valves is addressed by SR 3.5.1.2. This is a Ginna TS Category (iii) change.
- iv. Added the following new ITS testing requirements (Ginna TS Category (iv) change):
 - a. SR 3.5.2.1 - requires verification every 12 hours that ECCS related isolation valves are in their required position. These valves are currently specified in TS 3.3.1.1.g, 3.3.1.1.i, and 3.3.1.1.j.



- b. SR 3.5.2.2 - requires verification every 31 days that ECCS related valves which are not locked, sealed, or otherwise secured in position are in their correct position.

D. SAFETY EVALUATION

Not provided at this time.

E. SIGNIFICANT HAZARDS CONSIDERATION EVALUATION

Not provided at this time.

F. ENVIRONMENTAL CONSIDERATION

Not provided at this time.



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G. REFERENCES

1. NUREG-1431, *Standard Technical Specifications, Westinghouse Plants*, September 1993.
2. Letter from R.C. Mecredy, RG&E, to A.R. Johnson, NRC, Subject: *Conversion to Improved Technical Specifications*, dated February 28, 1994.
3. Letter from R.C. Mecredy, RG&E, to A.R. Johnson, NRC, Subject: *Application for Amendment to Facility Operating License, Upgrade of Administrative Controls Section 6.0*, dated May 13, 1994.
4. ITS Traveller CEOG-03.
5. Letter from A.R. Johnson, NRC, to R.C. Mecredy, RG&E, Subject: *Issuance of Amendment No. 57 to Facility Operating License No. DPR-18, R.E. Ginna Nuclear Power Plant (TAC No. M85326)*, dated December 7, 1993.
6. Letter from D.M. Crutchfield, NRC, to J.E. Maier, RG&E, Subject: *Decay Heat Removal Capability*, dated June 3, 1981.
7. Letter from D.M. Crutchfield, NRC, to J.E. Maier, RG&E, Subject: *Natural Circulation Cooldown, Generic Letter 81-21, R.E. Ginna Nuclear Power Plant*, dated November 22, 1993.
8. Regulatory Guide 1.45, *Reactor Coolant Pressure Boundary Leakage Detection Systems*.
9. NUREG-0821, *Integrated Plant Safety Assessment Systematic Evaluation Program, R.E. Ginna Nuclear Power Plant*, December 1982.
10. Generic Letter 84-04, *Safety Evaluation of Westinghouse Topical Reports Dealing with Elimination of Postulated Pipe Breaks in PWR Primary Main Loops*, February 1, 1984.
11. Generic Letter 91-04, *Changes in Technical Specification Surveillance Intervals to Accommodate a 24-Month Fuel Cycle*, April 2, 1991.



ATTACHMENT B

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

Included pages:

All pages in Appendix A to the Full-Term Operating License up to and including Amendment No. 57

ONLY RELEVANT SECTIONS ARE PROVIDED AT THIS TIME