

SAFEGUARDS INFORMATION



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ROBERT C. MECREDDY
Vice President
Nuclear Operations

March 18, 2002

Mr. Samuel J. Collins
Director, Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-0001

Subject: Twenty Day Response to Interim Safeguards and Security Compensatory Measures Order
R. E. Ginna Nuclear Power Plant
Docket No. 50-244

- References: (1) Letter from Samuel J. Collins, NRC, to Paul C. Wilkens, RG&E, Subject: *Issuance of Order for Interim Safeguards and Security Compensatory Measures for R.E. Ginna Nuclear Power Plant*, dated February 25, 2002.
- (2) Letter from Robert C. Mecreddy, RG&E, to Samuel J. Collins, NRC, Subject: *Request for Extension of Time to Submit a Request for Hearing*, dated March 18, 2002.

NOTICE The enclosure to this letter contains "Safeguards Information" which should be prevented from public disclosure in accordance with 10 CFR 73.21. Upon separation of the enclosure, this letter is "DECONTROLLED."

Dear Mr. Collins:

In Reference (1), the U.S. Nuclear Regulatory Commission (NRC) issued an Order, effective immediately, which modified the license for the R.E. Ginna Nuclear Power Plant under the criteria of 10 CFR 2.202. In accordance with the Order, Rochester Gas and Electric Corporation (RG&E) must respond to the Order within twenty days with a written answer under oath and affirmation. Also included within Section III of the Order was a requirement that RG&E notify the Commission within twenty days of the following:

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*5001
1 copy advanced
to B. Maslin

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- a. Condition B.1 - Identify if:
 - (1) RG&E is unable to comply with any of the requirements described in Attachment 2 of the Order,
 - (2) Compliance with any of the requirements is unnecessary in the specific circumstances of Ginna Station, or
 - (3) Implementation of any of the requirements would cause RG&E to be in violation of the provisions of any Commission regulation or the facility license.

- b. Condition B.2 - Identify if implementation of any of the requirements would adversely impact safe operation of the facility.

- c. Condition C.1 - Submit a schedule for achieving compliance with each requirement of Attachment 2 of the Order.

Condition C.2 of the Order also requires RG&E to report to the Commission when full compliance with the requirements of Attachment 2 of the Order is achieved.

The purpose of this document is to provide RG&E's answer as required under 10 CFR 2.202 and to respond to Conditions B.1, B.2, and C.1 of the Order. RG&E will respond to Condition C.2 when full compliance is achieved. The evaluation of each item contained within Attachment 2 of the Order, and our schedule for achieving compliance with these items, are contained on the attached enclosure. The schedule provided in the enclosure is the date when the associated requirement will be met. Consistent with the Order, RG&E has immediately initiated activities in these areas, and in many cases, may complete the activity earlier.

The current status of the 30 requirements contained within Attachment 2 of the Order can be summarized as follows:

- a. Implementation of the requirement is complete - 17
- b. Section III, Condition B.1.(1) applies - 0
- c. Section III, Condition B.1.(2) applies - 2
- d. Section III, Condition B.1.(3) applies - 0
- e. Section III, Condition B.2 applies - 0
- f. Implementation of the requirement has been initiated and will be complete by August 31, 2002 or sooner - 11

Please note that RG&E has identified three items in Attachment 2 of the Order (B.2.a(1), B.2.a(2), and B.2.b) that involve significant analysis in order to determine what measures will be required. RG&E is reserving its right to request a hearing on these items. By separate letter to the Director, Office of Nuclear Reactor Regulation (Ref. 2), RG&E is seeking an extension of time to request a hearing on these items. With the exception of these items, RG&E consents to the Order.

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I declare under penalty of perjury under the laws of the United States of America that I am authorized by RG&E to make this submittal and that the foregoing is true and correct.

Any questions should be directed to Mark Flaherty, Nuclear Safety and Licensing Manager at (585) 771-3275.

Very truly yours,


Robert C. Mecredy

Executed on March 18, 2002

MDF_242

Enclosure

xc: Mr. Samuel J. Collins (Room 5 D2, Mail Stop O-5E7)
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U.S. Nuclear Regulatory Commission
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Regional Administrator, Region I
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U.S. Nuclear Regulatory Commission
R.E. Ginna Nuclear Power Station Senior Resident Inspector

Copy w/o enclosure:

Mr. Robert L. Clark (Mail Stop O-8C2)
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