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June 14, 2002

Mr. Richard J. Conte
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U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-0001

Subject: Interim Compensatory Measures Associated with Prompt Notification System
Rochester Gas and Electric Corporation
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Conte:

On June 13, 2002, a conference call was held between various staff members of the Nuclear Regulatory Commission (NRC) and Rochester Gas & Electric Corporation (RG&E). The purpose of this call was to discuss issues associated with the prompt notification system for Ginna Station. During this conference call, RG&E agreed to provide documentation of its efforts related to this topic. This letter serves as that documentation.

In the early 1980's, an alerting system to make the public aware of an incident at Ginna Station that may require protective action on their part was developed and installed. This prompt notification system covers the entire emergency planning zone (EPZ) and consists of 96 sirens supplemented by more than 40 tone alert radios at schools, nursing homes, and industrial establishments. The design objective for this system is to complete the initial alerting of the affected population within the plume exposure pathway within 15 minutes after the decision to make the notification. The system was designed to assure coverage of essentially 100% of the population within the 10 mile EPZ which includes Monroe and Wayne counties. Sirens are activated by a radio signal through controllers utilizing a digital encoding system to ensure secure control over siren activation. This activation signal is initiated by Wayne and Monroe County via their 911 Call Centers or alternate county activation centers, with RG&E having backup activation capability.

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In 1993, a siren verification system was installed to provide remote feedback capability to the counties and RG&E from all 96 siren units. The system is used to verify proper siren activation and to identify whether inadvertent siren activations have occurred. The Monroe and Wayne county evacuation plans also contain backup notification procedures in the event of an identified siren malfunction. System testing has shown problems with the siren verification system such that the system may fail to adequately provide reliable and timely feedback as to the status of the sirens. This is in contrast to the siren units themselves which have demonstrated an overall high reliability during system actuation testing. That is, while almost all of the sirens activated and a portion of the feedback was received during the test conducted on May 9, 2002, RG&E has determined that additional corrective actions are needed to the feedback portion of the siren system.

A significant effort has been underway using the Ginna Station corrective action process to address the issues encountered with the siren system feedback. These efforts include:

1. Formalizing the procedures for siren testing and activation.
2. Training the county personnel who operate the system.
3. Including the Ginna Station siren system as an "Engineering System" similar to in-plant equipment (e.g., auxiliary feedwater system). This effectively places controls on the siren maintenance activities and implements more stringent configuration controls. A more comprehensive preventative maintenance program has been developed and is being implemented.
4. Transferring the responsibility for siren maintenance from corporate jurisdiction to the I&C Special Projects group so the work control falls under the Ginna Station Maintenance processes.
5. Contracting with a local communications company to implement measures to improve radio communications between the sirens and the control stations.

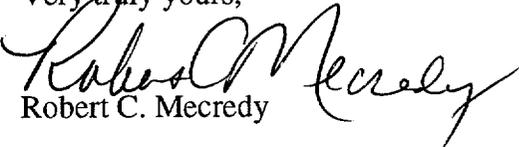
Additional corrective actions are being coordinated with the siren communication system vendor. Based on evaluating data from the May 2002 test, the vendor and RG&E have determined that it is necessary to implement software changes with subsequent hardware changes at each siren location. The manufactured hardware is not expected to be available until late August 2002 due to the design and testing requirements being implemented. RG&E anticipates that it will take up to one additional month to have the new components installed at each siren and conduct a follow up activation test. Given this time frame, RG&E is also evaluating a complete replacement of the siren communication system. RG&E expects to reach a decision either to continue with the existing communication system or to replace it by June 28, 2002.

In the interim, RG&E, Monroe County, and Wayne County have identified additional measures to ensure that the residents within the 10 mile EPZ are notified of a declared emergency at Ginna Station. These interim compensatory measures are:

1. Use of an automated telephone dialing system to deliver a message to residents within a 10 mile radius around Ginna Station. The message would inform residents that an emergency has been declared at Ginna Station and to listen to radio or television announcements for emergency information. This system would be part of the counties' notification process and would be implemented at the same time that the sirens are activated. The intended design is such that residents with publically accessible phone numbers within a 5 mile radius of Ginna Station would be notified within approximately 20 minutes. Calls to the entire EPZ would take up a total of 90 minutes if used alone. However, by integrating this with route alerting (see #2 below) this time would be reduced. Since the new automated telephone dialing system is initiated from the same company that initiates RG&E call-ins, the specified times assume that there is some limited time difference between declaring an emergency with attendant notification of RG&E personnel and the need to initiate the automated telephone dialing system for the EPZ. Based on initial discussions with the vendor, this new system is expected to be implemented by July 8, 2002.
2. Implement focused route alerting coincident with siren actuation. Currently, Wayne County (where Ginna Station is located) staffs local fire halls upon declaration of an Alert. These fire halls are located near sirens such that the fire personnel can rapidly identify if a siren has failed to activate. If the sirens fail to actuate, these personnel can begin to immediately perform route alerting. These personnel would then be dispatched to other areas for which there is no positive indication of siren actuation to achieve full coverage. This rapid version of route alerting will be formalized by June 21, 2002. For Monroe County, the counties would automatically send out responders to perform route alerting upon siren activation. Unless positive verification is obtained of successful siren actuation (as determined by either local indication or by the siren feedback system), route alerting would be initiated. Route alerting would begin from the highest population areas. In this manner, the time to notify residents would be minimized since the automated telephone system would notify those residents in lower population zones. This revised route alerting system will be formalized by June 21, 2002. Since the counties have agreed to these interim compensatory measures, they can be expected to implement them in the unlikely need to activate the prompt notification system prior to these dates. It should also be noted that the siren feedback system typically provides rapid feedback for lower number sirens. These sirens are generally located within the highest population areas of Monroe County which would help facilitate the most effective public notice and evacuation.

RG&E feels that the siren system remains the most effective means for Monroe and Wayne counties to perform prompt public notification related to Ginna Station. The above compensatory methods will help make for a more robust notification process until the siren feedback system is upgraded. Continued use of these interim compensatory measures after the upgrade has been completed will be evaluated at a later date. RG&E will provide an update of the feedback system upgrade (or replacement) and other described schedules by June 28, 2002.

Very truly yours,


Robert C. Mecredy

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