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ROBERT C. MECREDDY
Vice President
Nuclear Operations

September 23, 2002

U.S. Nuclear Regulatory Commission
Document Control Desk
Attn: Mr. Jack Cushing (Mail Stop O-12D-3)
Office of Nuclear Reactor Regulation
Washington, D.C. 20555-0001

Subject: Review Tools for Ginna Station License Renewal Application
R. E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Cushing.

Enclosed, as requested by the NRC staff, is a CD containing the RG&E "Review Tools" to be used by the NRC as an aid in reviewing the Integrated Plant Assessment portion of the Ginna Station License Renewal Application. The "Review Tools" are an electronic data review aid which permit the reviewer to navigate from plant-specific equipment identification numbers (EINs) through scoping and screening to applicable aging management programs for license renewal. The methodology and technology employed in the development of the "Review Tools" is proprietary to RG&E, and should therefore not be shared by NRC with other persons or organizations, and withheld from public disclosure per 10 CFR 2.790 (a)(4). The data contained within the "Review Tools" are not proprietary. Attached is an affidavit providing the basis for withholding the information from public disclosure.

We consider that the use of the "Review Tools" would be very beneficial in helping to improve the efficiency of the NRC's review of both the Ginna Station and, with some adjustments, other utilities' license renewal applications. This "first-of-a-kind" process would have generic value to the NRC and the industry. In view of the generic benefits to the NRC and the industry that will be achieved through use of the Review Tools, it would be appropriate for the NRC to grant a partial exemption from the Ginna Station LRA review fees, per 10 CFR 170.11 (b)(i). In our

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view, a partial exemption from the 10 CFR Part 170 fee requirements is appropriate for that portion of the review of the Ginna Station LRA using the Review Tools that the NRC staff determines has generic value to the NRC and industry. If the NRC is interested in discussing these requests further, please contact George Wrobel, License Renewal Project Manager, at (585) 771-3535.

Very truly yours,



Robert C. Mecredy

Enclosures

xc: Mr. Robert L. Clark (Mail Stop O-8-C2)
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Regulatory Regulation
U.S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

Regional Administrator, Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

U.S. NRC Ginna Senior Resident Inspector

Mr. Denis Wickham
Sr. Vice President Transmission and Supply
Energy East Management Corporation
P.O. Box 5224
Binghamton, NY 13902

Daniel F. Stenger
Ballard Spahr Andrews & Ingersoll, LLP
601 13th Street, N.W., Suite 1000 South
Washington, D.C. 20005-3807

Affidavit of Robert C. Mecredy

I, Robert C. Mecredy, Vice President, Nuclear Operations of Rochester Gas and Electric Corporation (RG&E), do hereby affirm and state:

1. I am authorized to execute this affidavit on behalf of RG&E.
2. RG&E has developed the "Review Tools" submitted herewith as an electronic data review aid specifically for the purpose of assisting in the preparation and review of the Ginna Station License Renewal Application. In accordance with 10 CFR 2.790 (a)(4), the methodology and technology employed to navigate from plant-specific equipment identification numbers through scoping and screening to applicable aging management programs is considered proprietary and confidential by RG&E. This information is to be used solely by the NRC in the review of the Ginna Station License Renewal Application. The data contained within the Review Tools are not considered proprietary.
3. The methodology and technology employed in the Review Tools have been held in confidence by RG&E; are of a type customarily held in confidence by RG&E; and have been transmitted to the NRC in confidence. This information is not available in public sources.

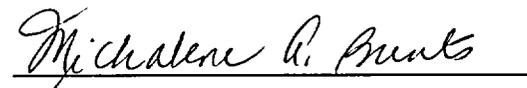
Rochester Gas and Electric Corporation


Robert C. Mecredy
Vice President, Nuclear Operations

State of New York

County of Monroe

Subscribed and sworn to me, a Notary Public, in and for the County and State above named, this 23rd day of September.



My Commission Expires: 1-11-03

[Notary Seal here]

MICHAELNE A BUNTS
Notary Public, State of New York
Registration No. 01BU6018576
Monroe County
Commission Expires Jan 11, 2003