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Robert C. Mecredy
Vice President
Nuclear Operations

March 8, 2004

Secretary
Office of the Secretary of the Commission
U.S. Nuclear Regulatory Commission
ATTN: Rulemakings and Adjudications Staff
Washington, DC 20555

Subject: Response to First Revised Order Establishing Interim Inspection Requirements for Reactor Pressure Vessel Heads at Pressurized Water Reactors
R. E. Ginna Nuclear Power Plant
Docket No. 50-244

References:
(1) Letter from R. William Borchardt, NRC, to Holders of Licenses for Operating Pressurized Water Reactors (Robert C. Mecredy, RG&E), Subject: *Issuance of First Revised NRC Order (EA-03-009) Establishing Interim Inspection Requirements for Reactor Pressure Vessel Heads at Pressurized Water Reactors*, dated February 20, 2004

(2) Letter from R.C. Mecredy, RG&E, to Office of the Secretary of the Commission, NRC, Subject: *Response to Revised Order Establishing Interim Inspection Requirements for Reactor Pressure Vessel Heads at Pressurized Water Reactors*, dated March 3, 2003

Dear Sir:

In Reference (1), the Nuclear Regulatory Commission (NRC) issued a revised 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 revised Order within 20 days with a written answer under oath and affirmation addressing the following:

1. Answer the Order as either consenting or requesting a hearing as described in Section V.

2. Identify if the licensee is unable to comply with any of the requirements of Section IV or if compliance with any requirements of Section IV is unnecessary.

RG&E has evaluated the requirements contained within Section IV of the revised Order and has determinated that it will comply as specified. Consequently, RG&E consents to entry of the revised Order.

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Attachment A lists those regulatory commitments which result from consenting to this revised Order. A revision bar is used to show differences from those commitments made in response to the original Order per Reference (2). It should also be noted that RG&E replaced the reactor vessel head during the fall 2003 refueling outage.

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 concerning this issue should be directed to Mr. Brian Flynn, Manager, Primary / Reactor Systems at (585) 771-3734.

Very truly yours,

Executed on March 8, 2004

Robert C. Mecredy

MDF_314

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U.S. Nuclear Regulatory Commission
Washington, DC 20555

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U.S. NRC Ginna Senior Resident Inspector

Attachment A
List of Regulatory Commitments

The following table identifies those actions committed to by Rochester Gas & Electric (RG&E) in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments. A revision bar is used to show changes to commitments made in response to the original Order in the RG&E letter dated March 3, 2003. Please direct questions regarding these commitments to Mr. Brian Flynn, Manager, Primary / Reactor Systems at (585) 771-3734.

REGULATORY COMMITMENT	DUE DATE
Calculate the susceptibility category of the Ginna Station reactor pressure vessel head per Section IV.A and IV.B of the revised Order dated February 20, 2004.	Prior to shutdown for each refueling outage (RFO).
Perform inspections of the reactor vessel pressure head per Section IV.C of the revised Order dated February 20, 2004. Submit report to NRC detailing the inspection results.	As required. Within 60 days after returning plant to operation.
Perform visual inspections during each RFO to identify potential boric acid leaks from pressure-retaining components above the reactor pressure vessel head. Submit report to NRC detailing the inspection results if leaks are found.	Each RFO. Within 60 days after returning plant to operation.
If boron deposits are discovered on the surface of the reactor pressure vessel head or related insulation, perform inspections of the affected head surface and penetrations appropriate to the conditions found to verify the integrity of the affected area and penetrations. Submit report to NRC detailing the inspection results.	Prior to returning plant to operation. Within 60 days after returning plant to operation.