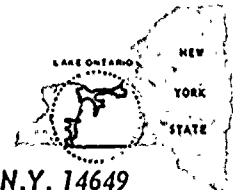




ROCHESTER GAS AND ELECTRIC CORPORATION • 89 EAST AVENUE, ROCHESTER, N.Y. 14649



LEON D. WHITE, JR.
VICE PRESIDENT

TELEPHONE
AREA CODE 716 546-2700

August 5, 1980

Director of Nuclear Reactor Regulation
ATTN: Mr. Dennis M. Crutchfield, Chief
Operating Reactors Branch #5
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Subject: Assignment of Personnel as Shift Technical Advisor (STA)
R. E. Ginna Nuclear Power Plant, Unit No. 1
Docket No. 50-244

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REGISTRATION SERVICES UNIT

Dear Mr. Crutchfield:

This letter will serve as Rochester Gas and Electric Corporation's response to the evaluation of Lessons Learned Category "A" requirement 2.2.1.b, "Shift Technical Advisor," issued by your letter dated July 7, 1980 and supersedes our response contained in pages 75 through 77 of our December 28, 1979 submittal.

The present shift operation organization, augmented by the assignment of a Shift Technical Advisor (STA) who has a bachelor's degree in science or engineering, or who holds a NRC Senior Reactor Operator License (SRO), is the method RG&E uses to assure that acceptable and adequate personnel are assigned as STA. Since July 1, 1980 only those individuals who are licensed SRO's or who have a bachelor's degree in a scientific or engineering discipline have been assigned as the STA. This will continue to be our policy, pending NRC issuance of long-term requirements for STA.

The Ginna Station Operation Department consists of five shifts with a minimum of five operators per shift, two of whom normally hold Senior Reactor Operator Licenses. The Shift Supervisors have maintained their licenses since before January 1970 and have a broad knowledge of plant design and operation.

The present shift complement is normally comprised of a Shift Supervisor (SRO), Head Control Room Operator (SRO), Control Room Operator (RO) and 3 Auxiliary Operators (some with RO licenses). To meet the requirements of the Accident Assessment Function one additional individual is assigned to the shift when the reactor is critical and is designated as Shift Technical Advisor. During an off-normal transient, this additional individual

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DATE August 5, 1980

TO Director of Nuclear Reactor Regulation
ATTN: Mr. Dennis M. Crutchfield, Chief

will be in the control room and will only be functioning in the technical advisory capacity to the Shift Supervisor. The STA administratively reports to the Technical Assistant for Operational Assessment.

Administrative procedure A-201 "Ginna Station Administrative and Engineering Staff Responsibilities" has been revised in August, 1980 to clarify the responsibilities of the STA and the responsibilities of the Technical Assistant for Operational Assessment.

The Training Program to augment the plant specific education of the assigned STA for the Accident Assessment function in the Control Room will begin September 2, 1980 for those STA's who are not licensed SRO's. These individuals already have a bachelor's degree. This educational program will assure that non-licensed individuals receive additional training in plant layout, operation and response to transients. We expect this training to be substantially completed by November 14, 1980.

When the NRC prepares definitive long-term STA requirements, we will evaluate our STA program at that time and prior to implementation of the long-term requirements. We have 10 years of operating experience with a total of 164 man-years of licensed operator experience. This safe operation experience and an expanded training program provides a high level of confidence that the operating staff will perform safely and properly under accident conditions.

Very truly yours,



L. D. White, Jr.

