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SUBJECT: Comments on 800506 presentation to NRC Commissioners re
 status of SEP & description of difficulty as lack of
 aggression by licensees.NRC has not provided guidelines &
 issues w/higher priorities have arisen.

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WASHINGTON, D. C.

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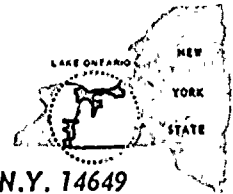
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LEON D. WHITE, JR.
VICE PRESIDENT

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June 12, 1980

Mr. Darrell G. Eisenhut, Director
Division of Project Management
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Eisenhut:

We recently reviewed the transcript of the presentation you and others from the NRC Staff made to the Commissioners on May 6, 1980 regarding the status of the Systematic Evaluation Program (SEP). We were disappointed to note that you described a major program difficulty as being "licensees not aggressively pursuing program." Further, we drew the inference from the presentation that licensees were being uncooperative in providing the proper information to the Staff. We are disappointed for two reasons. First, that the NRC Staff has not communicated to us any specifics regarding what we should now be doing that we are not now doing. And second, we do not believe the Staff characterization of program difficulties to be fair. The purpose of this letter is to provide Rochester Gas and Electric Corporation's views on our aggressiveness in the Systematic Evaluation Program and to briefly outline our views on program difficulties.

It has been clear to us that the SEP is the NRC Staff's program. This precept was stated initially and has been restated a number of times. It was most recently evidenced in a letter dated December 12, 1979 which categorized topics into those that the NRC would address and those for which the licensee would be asked to bear major responsibility. The areas that we have been asked to perform major reviews have been few in number. In the December 12 letter, the Staff stated that we would be provided guidelines for our efforts.

Lack of guidelines for some topics should not however, be taken to mean that we have ignored these and other topics. Substantial work has been performed in support of Staff site visits and evaluations. An example is preparation and review of safe shutdown techniques, including discussion in licensed operator training classes, which was completed prior to the Staff's safe shutdown site visit of June 14-16, 1978 and has been continued since that time. That work has been useful in addressing other licensing and operating concerns and has, we believe, provided a stronger operating complement.

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TO Mr. Darrell G. Eisenhut, Director

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Another example was our study on electrical penetrations, submitted on April 12, 1979. Although initiated for reasons other than SEP, our Seismic Upgrade Program is a major initiative. As described to your Staff on July 24, 1979, this program will result in reanalysis of all major seismic category I piping at Ginna. The results of our program will be incorporated into the Staff's SEP evaluation as described in an NRC letter dated April 29, 1980.

Program difficulties and the attendant slippage in completion dates is not unexpected to us. First, the Program began without clearly defined review criteria. While realistic assessments, giving credit for alternate methods of satisfying criteria, were to be performed, little guidance on how to perform these realistic assessments or what constituted an acceptable level of "realism" was provided for the Staff reviewers. This is certainly understandable since no such program had been performed previously. Further, it was probably desirable not to be overly prescriptive prior to beginning the Program but to let experience gained during early reviews shape the review techniques to be used later. Progress has thus been deliberate.

Secondly, issues with higher priorities have arisen during the SEP which could not be foreseen. These have affected the Staff reviews in some cases and the licensees resources in others. Although they are well known, it is useful to mention several of these: environmental qualification of electrical equipment, IE Bulletins 79-02, 79-04, 79-14, and responses to the lessons learned from TMI are but several.

A third reason that we perceive for slippage is the changing of Staff reviewers on individual topics. These changes have been due to reviewer transfers or promotions or, most recently, to the reorganization within NRR. A few examples in this area may be illustrative. Control room habitability was a part of an SEP site visit on September 6, 1978. Since that time there has been an additional site visit and there have been two subsequent reviewers. Further, a related aspect, offsite hazards, was assigned to another reviewer. He obtained substantial information from us and we understand that he made a number of the contacts gathering information. Unfortunately, prior to preparing his assessment he was transferred to another NRC Branch. It may, therefore, be necessary for a new reviewer to reperform this task. Another example is Topic II-2.D, Meteorological Measurements Program. Information on the topic was provided informally on August 24, 1978. In response to a draft safety assessment which we reviewed with the Staff on May 29, 1979, we provided comments both informally (July 5, 1979) and formally (April 11, 1980). Further we have made numerous attempts to discuss this topic with the Staff either via telephone or in a meeting but have been unsuccessful in our attempts to arrange a technical

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dialogue. In Topic III-5.A, High Energy Line Breaks Inside Containment, we provided the Staff with information during a site visit in March 1979 and by submittals dated February 9, 1979 and September 11, 1979. Since that time, we have been informed that the Staff is radically revising the analysis guidelines, jeopardizing much of the progress made to date by us and other SEP utilities. At this time, we are awaiting Staff response to our submittals or Staff issuance of the revised guidelines.

Based on our review of SEP, we do not believe that the reasons for slippage in SEP should be attributed to lack of licensee aggressiveness. It is apparent, however, that there needs to be increased communications between the Staff and RG&E regarding the status and progress of SEP. We would be pleased to discuss the SEP with you or your Staff at your convenience.

Very truly yours,

L.D. White, Jr.

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