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 FACIL: 50-244 Robert Emmet Ginna Nuclear Plant, Unit 1, Rochester G      05000244  
 AUTH. NAME      AUTHOR AFFILIATION  
 MAIER, J.E.      Rochester Gas & Electric Corp.  
 RECIPIENT NAME      RECIPIENT AFFILIATION  
 CRUTCHFIELD, D.      Operating Reactors Branch 5

SUBJECT: Forwards response to Generic Ltr 82-10 requesting confirmation for completion of certain TMI items & addl scheduler info.

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 TITLE: Response to NUREG -0737/NUREG-0660 TMI Action Plan Rgmts (OL's)

NOTES: NRR/DL/SEP 1cy. 05000244

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	IE/DEP EPDS		1	1	IE/DEP/EPLB		3	3
	NRR/DE DIR	21	1	1	NRR/DE/ADCSE	22	1	1
	NRR/DE/ADMQE	23	1	1	NRR/DHFS DIR	28	1	1
	NRR/DHFS/DEPY	29	1	1	NRR/DL DIR	14	1	1
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	NRR/DL/ADSA	17	1	1	NRR/DL/ORAB	18	3	3
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	NRR/DSI/ADRP	26	1	1	NRR/DSI/ADRS	27	1	1
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	NRR/DSI/RAB		1	1	NRR/DST DIR	30	1	1
	NRR/DST/ADGP	31	1	1	NRR/DST/ADT	32	1	1
	<u>REG FILE</u>	04	1	1	RGN1		1	1
EXTERNAL:	ACRS	34	10	10	FEMA-REP DIV		1	1
	INPO, J. STARNES		1	1	LPDR	03	1	1
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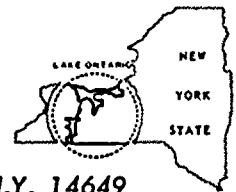
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THE NATIONAL BUREAU OF STANDARDS  
BUREAU OF METROLOGY  
WASHINGTON, D.C.

UNITED STATES DEPARTMENT OF COMMERCE  
BUREAU OF STANDARDS  
WASHINGTON, D.C.

TEST REPORT

ITEM	TEST	RESULTS	REMARKS
1	...	...	...
2	...	...	...
3	...	...	...
4	...	...	...
5	...	...	...
6	...	...	...
7	...	...	...
8	...	...	...



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

JOHN E. MAIER  
Vice President

TELEPHONE  
AREA CODE 716 546-2700

June 11, 1982

Director of Nuclear Reactor Regulation  
Attention: Mr. Dennis M. Crutchfield, Chief  
Operating Reactors Branch No. 5  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Subject: Post-TMI Requirements (Generic Letter 82-10)  
R. E. Ginna Nuclear Power Plant  
Docket No. 50-244

Dear Mr. Crutchfield:

Darrel Eisenhut's letter dated May 5, 1982 and addressed to all licensees of operating power reactors requested that we confirm the completion of certain TMI items and provide additional schedular information for other items. The applicable items of the enclosure to Mr. Eisenhut's letter which require a response are addressed in Attachment A of this letter.

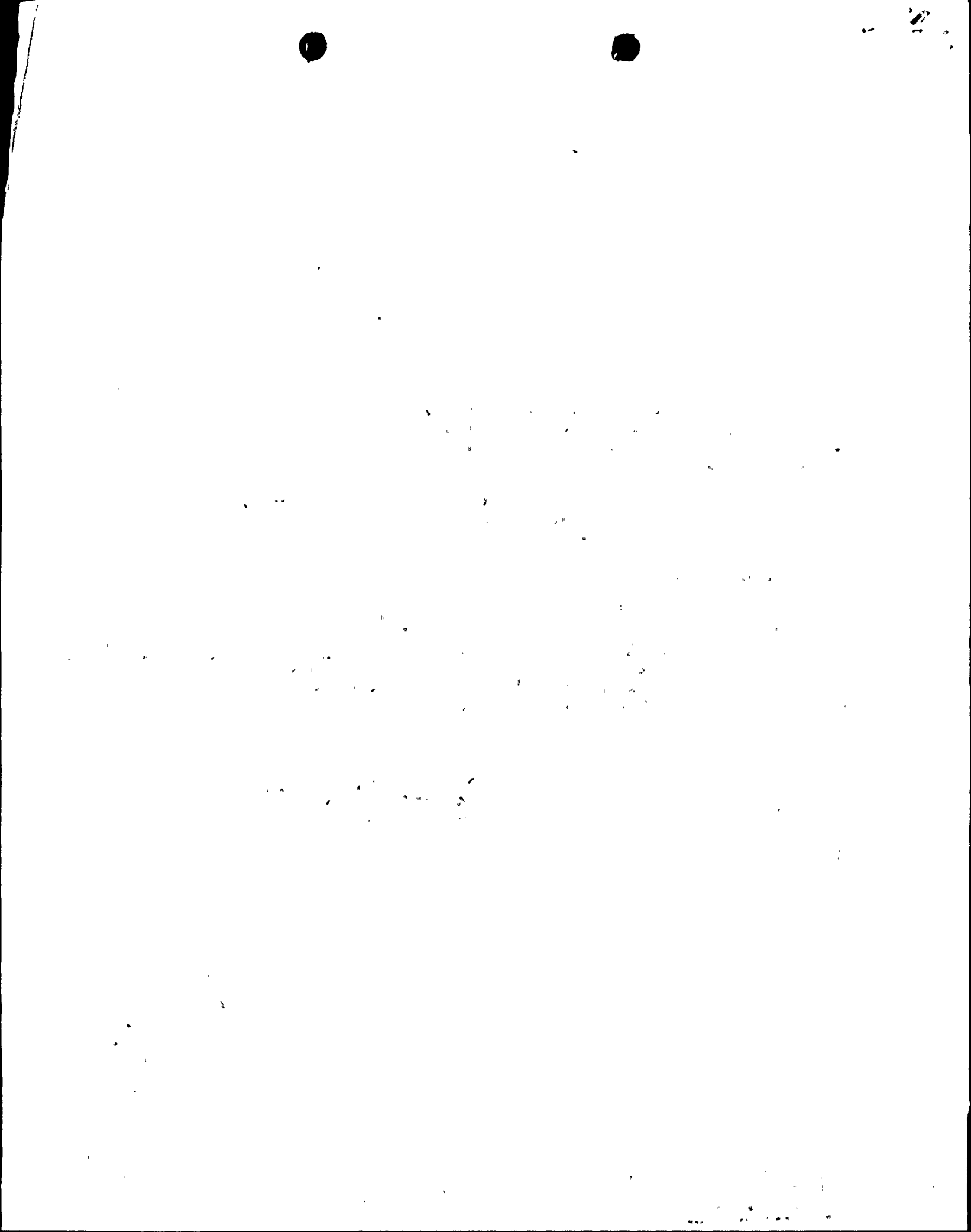
Very truly yours,

  
John E. Maier

Attachment

A046

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PDR ADDCK 05000244  
PDR



ATTACHMENT A

NUREG-0737 ITEMS SCHEDULED AFTER MARCH 1, 1982

Item

1.A.1.3.1 REQUIREMENT: Revise administrative procedures to limit  
Limit overtime in accordance with NRC Policy Statement issued  
Overtime by Generic Letter No. 82-02 dated February 8, 1982.

RESPONSE: RGE administrative procedures which limit overtime are in substantial agreement with the NRC Policy Statement. Descriptions of the RGE overtime policy and administrative procedures were provided in letters dated October 13, 1980, December 15, 1980 and December 30, 1980. NRC acceptance of this policy and the procedures was given in a November 16, 1981 letter from Dennis M. Crutchfield to John E. Maier.

1.A.1.3.2 REQUIREMENT: Augment current shift staffing to  
Minimum conform with the minimum levels set forth on page 3-9  
Shift Crew of NUREG-0737.

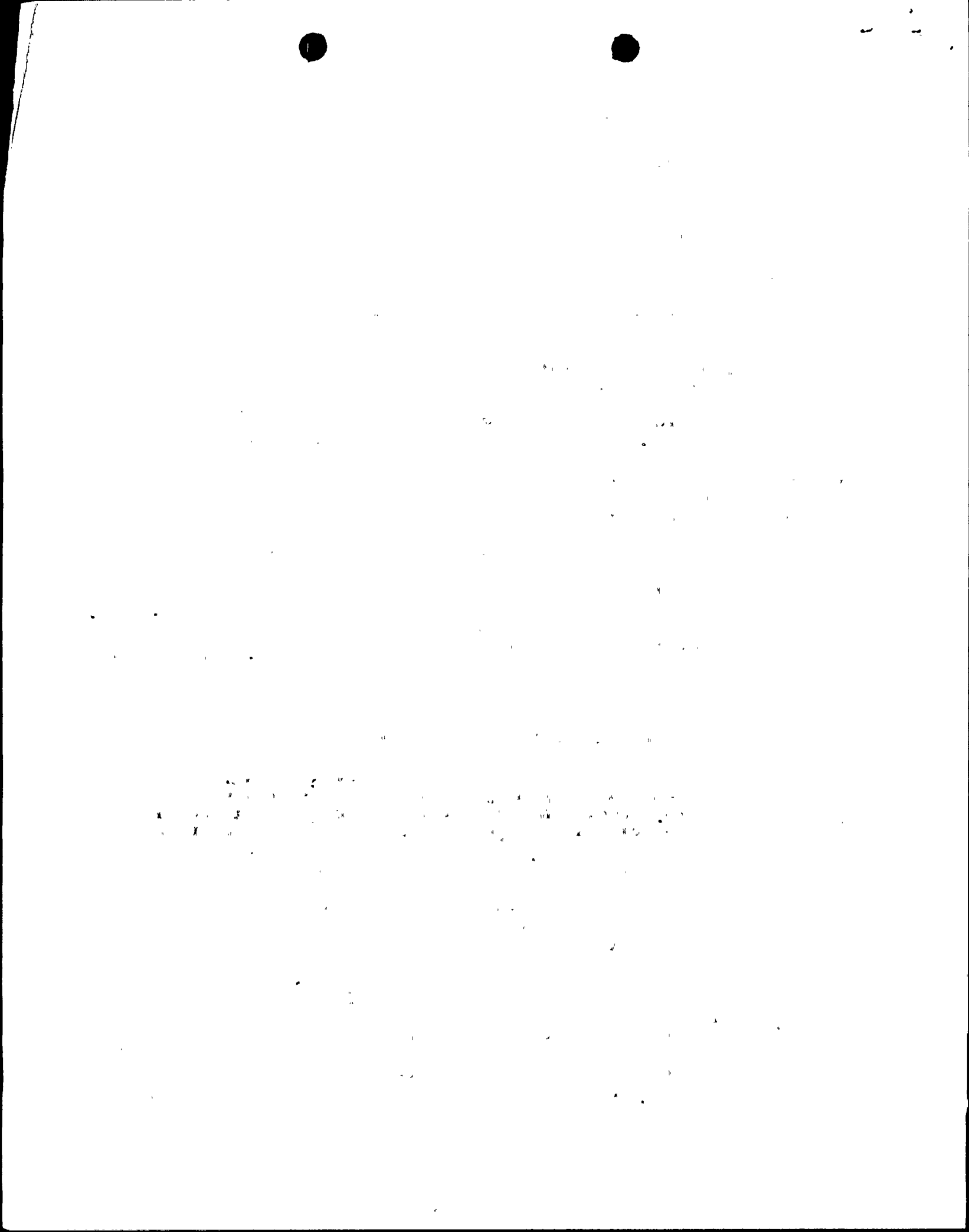
RESPONSE: An RGE letter dated February 1, 1982 provided a schedule for implementation and the basis for that schedule.

1.C.1 REQUIREMENT: Revise procedures by next refueling  
Revise outage; first refueling after October 1, 1982.  
Emergency  
Procedures

RESPONSE: Complete restructuring of existing emergency procedures is a monumental task. The work has involved Westinghouse, our NSSS supplier, the Westinghouse Owners Group and INPO. Generic procedural guidance based upon system analyses is produced by Westinghouse. INPO is producing written guidance for use by utilities in implementing generic procedures, for verification of the procedural techniques and validation of the revised procedures.

The best estimates that we have been given for completion of the Westinghouse and INPO Emergency Operating Procedure (EOP) work are given below:

<u>Product</u>	<u>Supplier</u>	<u>Date</u>
Generic Procedures for Low Head SI Plants	W	8/82
Generic EOP Implementation Guidance	INPO	10/82
Generic EOP Writers Guide	INPO	12/82
Generic EOP Verification Guidance	INPO	12/82
Generic EOP Validation Guidance	INPO	12/82



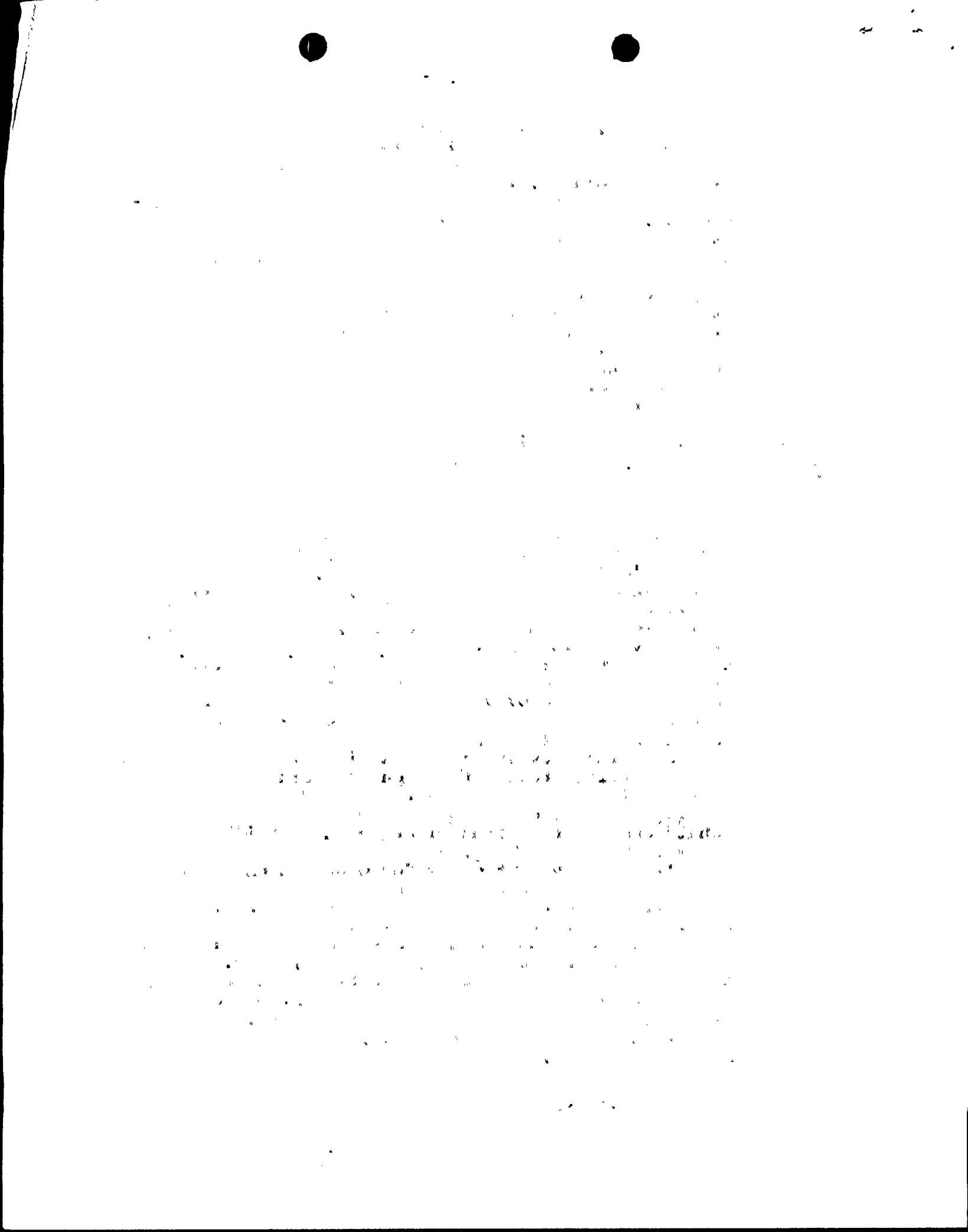
At least a year will be required to produce an acceptable EOP network after the guidelines are in hand. Significant time has been spent by licensed operators and staff in training, retraining and plant simulation exercises with the existing procedures. The new procedures, and the personnel training which must occur prior to procedure implementation, must be written and implemented only with due deliberation. Thus, the earliest that we expect to have a new set of EOPs in place for use is December 1983. This estimate may prove to be optimistic as we proceed further with procedure work. We will inform you if revisions to this schedule are necessary. In the interim, we are confident that our existing procedures and the experience of our operating staff are adequate to cope with emergency conditions.

II.D.1.2  
RV & SV  
Test  
Program

REQUIREMENT: Submit plant specific reports on relief and safety valve program.

RESPONSE: The recommended submittal date of April 1, 1982 was revised to July 1, 1982 by Darrel Eisenhut's letter dated September 29, 1981. RGE stated in a letter dated April 15, 1982 that our plant specific evaluations had been initiated and a preliminary evaluation of results was underway, but that completion of the evaluation might extend beyond July 1, 1982. A comprehensive valve qualification report is being prepared to address in depth the pertinent issues required by NUREG-0737. It is expected that the Ginna specific valve evaluations will be completed during July 1982 and will be submitted to you shortly thereafter. Our preliminary evaluation of April 15, 1982 which stated that the valves tested represent the Ginna safety and relief valve designs and that the conditions tested envelope the range of expected operating and accident conditions for the Ginna plant remains valid.

A preliminary evaluation of the Ginna discharge piping is expected to be completed in August 1982. Thermal hydraulic evaluations are being performed now. If the results indicate that no reanalysis is required and no plant modifications are necessary, a submittal of the results could be prepared by October 1, 1982. If additional analyses or plant modifications are required, an implementation schedule will be formulated and submitted after completion of conceptual design work. Conceptual modification design, if required, will not be completed before January 1, 1983.





II.D.1.3 REQUIREMENT: Submit report of test program.  
Block  
Valve Test  
Program

RESPONSE: It is anticipated that a generic report of block valve testing results prepared by EPRI will be submitted to the NRC before July 1, 1982 by the chairman of the utility valve testing group.

II.K.3.30 REQUIREMENT: Submit plant specific analyses one  
and 31  
SB LOCA  
Analysis

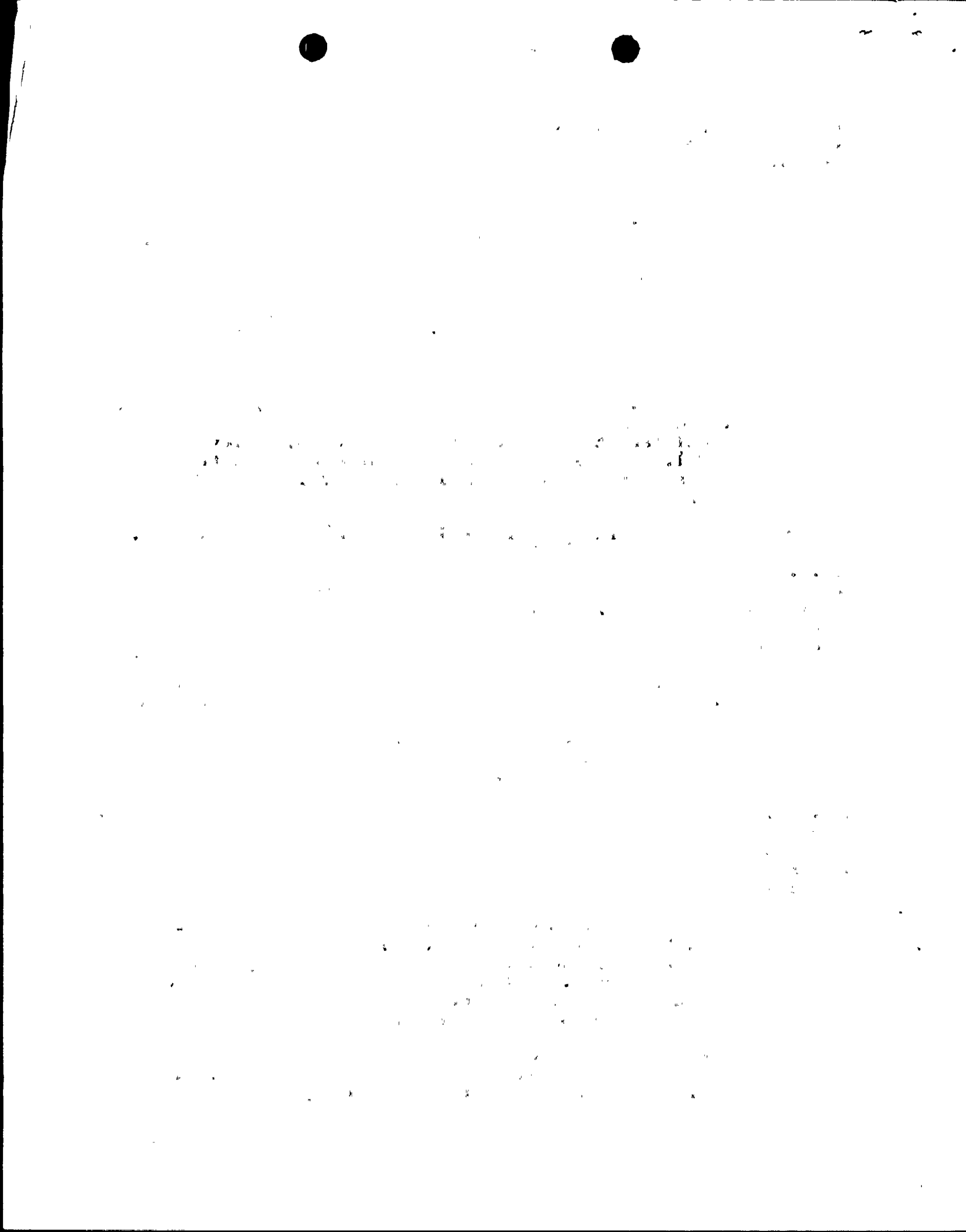
RESPONSE: An RGE letter dated January 19, 1982 provided the Westinghouse position on small break LOCA analysis models and the schedule for submittal of a revised model. RGE will develop a schedule for submitting revised analyses, if required, after the NRC has approved a revised model and the extent of the reanalysis, the number utilities requiring reanalysis and the work load of Westinghouse has been evaluated.

III.A.1.2 REQUIREMENT: Provide for augmentation of staffing  
Staffing  
Levels for  
Emergency  
Situations

RESPONSE: An RGE letter dated May 1, 1981 described our capabilities for response to emergency situations. Existing call-in procedures, coupled with the proximity of corporate support and staff training, provide adequate staffing and augmentation of normal staffing levels when required.

III.A.1.2 REQUIREMENT: Complete modifications by October 1, 1982.  
Upgrade  
Emergency  
Support  
Facilities

RESPONSE: Plant modifications necessary to provide an Operations Support Center (OSC), Technical Support Center (TSC) and Emergency Offsite Facility (EOF) have been completed. All of these facilities were demonstrated to function adequately during the Ginna tube rupture incident on January 25, 1982. Additional equipment for monitoring plant parameters in the TSC and EOF remains to be installed. The additional monitoring capability will enhance the support facility operation although adequate capability already exists.



The equipment to be added in the TSC and EOF will receive input from the Safety Assessment System (SAS) and a new plant process computer. The specification for the SAS was provided to the NRC Staff with a letter dated June 8, 1981. Development of this advanced data acquisition and display system is proceeding on schedule with installation expected no earlier than late 1984.

III.A.2.2 REQUIREMENT: Complete modifications by October 1, 1982.  
METEOROLOGICAL  
DATA

RESPONSE: An RGE letter dated July 1, 1981 provided a description and a schedule of implementation for an upgraded meteorological measurements and analysis program. We are implementing the program on the schedule that we provided, with one change to the program. The proposed long term meteorological system configuration shown on Figure 4 of the July 1 submittal, which was to use RGE computers for data analysis, will not be implemented at this time. The proposed near term meteorological system configuration using an onsite minicomputer and offsite contracted computing facilities will remain as the planned configuration.

Our July 1, 1981 submittal requested an expeditious review of our proposed plan because the NRC requirements were not clearly defined and we had been informed that the requirements might be revised. We have recently received (May 27, 1982) an Emergency Preparedness Appraisal from Region 1 which includes at least an I&E review of our capabilities. We have not yet completed a detailed review of the appraisal. If any changes to our program are necessary we will develop an implementation schedule and submit it at an appropriate time. Discussions with members of both NRR and IE indicate that some requirements are still in a state of flux and some may not yet be formulated. In either case a definitive implementation schedule cannot be laid out.

The meteorological measurements and analysis program being implemented by RGE is, in our view, acceptable and will provide the information necessary for effective management of emergency situations to protect public health and safety.

III.D.3.4 REQUIREMENT: Modify facility as identified by licensee  
Control study.  
Room  
Habitability

RESPONSE: An RGE letter dated September 4, 1981 provided an evaluation of the Ginna control room HVAC



[The body of the document contains extremely faint and illegible text, likely due to low contrast or overexposure. The text appears to be organized into several paragraphs, but the individual words and sentences cannot be discerned.]

system. Plant modifications identified as a result of this evaluation are summarized below along with the scheduled installation date.

<u>Modification</u>	<u>Date</u>
1. Limit maximum intake rate of outside air	July 1, 1983
2. Provide new ammonia, chlorine and radiation detectors with automatic HVAC isolation	July 1, 1983
3. Alter existing ductwork to assure proper filtration in post-accident operation	82 refueling

In addition, RGE committed to evaluate charcoal filter residence times and to evaluate alternatives for reducing control room ammonia concentrations by July 1, 1982.

Modifications 1 and 2 are expected to be completed on schedule. Modification 3 was completed during our recent refueling outage. The evaluations to be completed by July 1, 1982 will be delayed because of the length of the outage and the additional work which resulted from the January 1982 tube rupture incident. Those evaluations are expected to be completed by October 1, 1982.

Other reviews of the Ginna control room HVAC system conducted for SEP and environmental qualification of equipment may result in additional modifications. If so, it is anticipated that the additional modifications will be performed on a schedule consistent with the currently proposed regulation 10CFR 50.49.

