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 FACIL: 50-244 Robert Emmet Ginna Nuclear Plant, Unit 1, Rochester G 05000244  
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 WHITE, L. D. Rochester Gas & Electric Corp.  
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 EISENHUT, D. G. Division of Licensing

SUBJECT: Concurs w/NRC 810114 ltr re SEP commitments agreed to in meetings between SEP Owners & NRC SEP personnel. Listing of SEP topics anticipated for completion by 810630 encl.

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 TITLE: SEP Topics

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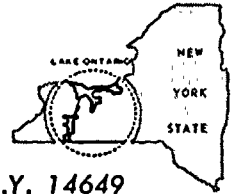
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February 4, 1981

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

Subject: Systematic Evaluation Program  
R. E. Ginna Nuclear Power Plant  
Docket No. 50-244

US NRC  
DIVISION OF LICENSING  
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REGISTRATION  
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Dear Mr. Eisenhut:

Rochester Gas and Electric received your letter of January 14, 1981 and concur that the majority of the commitments specified were agreed to in meetings among the SEP Owners with representatives of the NRC SEP staff. Specifically, the SEP Owners Group program provides that: (1) 60% of the topic assessments are to be completed by the end of June, 1981; and (2) a utility be identified to work with the NRC staff reviewers and help the staff develop the initial draft topic assessment for each topic which does not yet have a preliminary assessment.

It is expected that not all topics will have a final assessment by the end of June, 1981 because of the long lead characteristics or inadequate definition of applicable criteria for a number of topics. However, this number of topics is small, and will not impede provision (1) above. As discussed, there will be a 90-day trial period of this approach. At the end of this time period, an assessment of the progress of this approach will be made.

The nine SEP Owners Group plants represent 1233 SEP topics, whose resolution is required such that orderly and complete SERs can be issued for each plant. As of January 9, 1981, 504 of those topics were identified as deferred from the SEP as a generic issue or were not applicable to SEP. In addition, 207 topics had draft or final SERs issued. The SEP Owners Group members will review the SERs already completed and apply the review criteria, as well as findings, where possible, to generate assessments of that topic for other plants. Where no SER is yet completed, the designated plant for that particular topic will cooperate with the NRC in developing the final SER, which will include the review criteria based on specific regulations, regulatory guides

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and Standard Review Plan sections, as well as acceptable alternatives. The resultant SERs will also be used by the other SEP plants to generate assessments, where applicable. It is anticipated that the draft SERs issued by January 15, 1981 will be reviewed and returned to the staff for finalization by the end of February, 1981. Draft SERs issued subsequent to January 15, 1981 will be reviewed for accuracy and returned to the staff in 30 days from date of receipt. Where further study is required to evaluate the NRC assessment, a schedule for completion will be provided.

In order for these goals to be realized by the staff and the SEP Owners Group, the staff's resources are expected to be concentrated toward prompt issuance of draft SERs and to review the licensee topic assessment submittals and SER responses. Of course, where the staff has employed consultants to perform certain evaluations, particularly electrical, instrumentation and control, it would be expedient for the consultants to complete draft SERs on each of their topics for each of the plants, rather than have them judge a licensee's topic assessment and then generate an SER.

In response to the specific conditions in your January 14, 1981 letter:

1. RG&E agrees to complete SEP topic assessments for topics which already have a draft assessment for staff review by June 30, 1981 such that a 60% aggregate total of assessments will have been completed or submitted for review.
2. RG&E commits to actively aid the NRC staff to complete SERs for the SEP topics which do not yet have a draft SER. It should be understood that some of the topics with long lead times or with deficient criteria may not be completed by June 30, 1981.
3. RG&E as members of the SEP Owners Group agrees to the 90 day trial period.
4. RG&E considers that NRC resources should be expended to work with the SEP plants to effect the lead topic approach. Additional staff work being completed on Palisades as part of the "lead plant" concept should not interfere with this approach.
5. RG&E will not be able to supply a local representative during the SEP program.
6. RG&E agrees that the SEP Owners Group should meet periodically (bi-monthly) with NRC SEP management to discuss SEP progress and program planning.



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7. RG&E agrees to respond to draft SERs and advise the NRC SEP staff of findings within the 30 day response period.

A listing of topics which RG&E anticipates completing by June 30, 1981 is provided in attachment 1 (not every one of those topics may be completed, however). When taken together with the topics already completed, generic, or not applicable, the total number of topics complete for Ginna by the end of June 1981 is expected to be close to 70%.

RG&E and the SEP Owners Group appreciates the staff's adoption of the Owners Group plan to implement resolution of SEP topics preparatory to the development of the integrated assessment for each of the SEP plants. It is anticipated that the commitments specified above satisfy the staff requirements for orderly resolution of the SEP. However, Rochester Gas and Electric is extremely concerned with the NRC Staff's concept of the program required to respond to Public Law 110 as expressed in SECY 81-13. In previous discussions with the NRC Staff, we had been led to believe that the integrated assessment performed for SEP would largely, if not totally, satisfy the requirements of Public Law 110 for the SEP plants. SECY 81-13 implies that the SEP utilities will be expected not only to support the SEP topic assessments and integrated assessment but also to provide documentation comparing the plants against the yet-to-be-released revision to the Standard Review Plan, and to provide this SRP documentation simultaneous with the SEP effort. RG&E does not have the resources to pursue both programs as described in SECY 81-13. We would thus appreciate clarification of the Staff's intention for the SEP plants regarding Public Law 110.

Very truly yours,

*L. D. White, Jr.*  
L. D. White Jr.

LDW:bk





Attachment

RG&E SEP Topics

- A. Generic or not applicable: 52
- B. Previously completed\*: 19
- C. Additional candidate topics for completion by June 30, 1981
  - II-2.A - Severe Weather
  - II-2.C - X/Q
  - II-3.C - Ultimate heat sink (lead plant)
  - II-4.A - Seismicity
  - II-4.B - Seismicity
  - II-4.C - Seismicity
  - II-4.D - Stability of slopes
  - II-4.F - Settlement of foundations
  - III-5.A - High energy line break (lead plant)
  - III-5.B - Pipe break outside containment
  - III-12 - Environmental qualification
  - IV-2 - Reactivity control systems
  - V-5 - RCPB leak detection
  - V-11.B - RHR interlocks (lead plant)
  - VI-7.A.1 - Vessel head temperature
  - VI-7.A.3 - ECCS actuation system
  - VI-7.C - ECCS single failure criterion
  - VI-10.A - Testing of reactor trip systems and ESF
  - VII-1.A - Isolation of RPS from non-safety systems
  - VII-3 - Systems for safe shutdown
  - VIII-2 - Diesel generators
  - IX-1 - Fuel storage
  - IX-3 - Service and cooling water systems
  - X - Auxiliary feedwater system (lead plant)
  - XV-1 - Decrease in FW temperature transient (lead plant)

\*Note that Ginna is lead plant on topics III-4.B, III-7.D, and VI-7.F.

