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 MECREY, R.C. Rochester Gas & Electric Corp.
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 Information & Records Management Branch (Post 890827)

SUBJECT: Forwards response to request for voluntary participation in NRC regulatory impact survey.

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February 28, 1990

Information and Records Management Branch
Division of Information Support Services
Office of Information and Resources Management
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Request For Voluntary Participation In
NRC Regulatory Impact Survey
(Generic Letter No. 90-01)

Gentlemen:

Enclosed is Rochester Gas and Electric Corporation's voluntary response to the USNRC request for regulatory impact survey information.

Any questions regarding the enclosed material should be directed to Mr. Richard Morrill 315-524-4446 extension 655.

Very truly yours,

Robert C. Meckedy
Division Manager
Nuclear Production

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Washington, D.C. 20503

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NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: Routine NRC
inspections.

2. Based on actual experience over the past several years, about how often is this activity conducted? Twenty-six times (26)
per year.

3. Operations/Construction areas covered: _____

4. Extent of the activity (how many people, for how long) _____
Number of inspectors varies and time may vary from one week
to one month.

5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.
 - a. Plant Department Heads 4.6% (number involved) 10
 - b. Plant Manager 5.6%
 - c. Corporate Department Heads 1.3% (number involved) 10
 - d. Corporate Vice President 2.1% (number involved) 3
(Division Heads)
 - e. Chief Nuclear Officer 3.7%
(Senior Vice President, Production and Engineering)

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: NRC Team Inspections

2. Based on actual experience over the past several years, about how often is this activity conducted? Three (3) per year.

3. Operations/Construction areas covered: Specific topics such as SSFI, EQ Audit, Startup Preparation.

4. Extent of the activity (how many people, for how long) Four (4) to eight (8) individuals for an average of two weeks.

5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.
 - a. Plant Department Heads 2.0% (number involved) 6
 - b. Plant Manager 1.2%
 - c. Corporate Department Heads 4.5% (number involved) 4
 - d. Corporate Vice President 1.2% (number involved) 2
(Division Heads)
 - e. Chief Nuclear Officer 1.2%
(Senior Vice President, Production and Engineering)

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: INPO evaluations.

2. Based on actual experience over the past several years, about how often is this activity conducted? Four (4) times per year.

3. Operations/Construction areas covered: Operations, Maintenance, Training and Emergency Preparedness.

4. Extent of the activity (how many people, for how long) _____
Varies from fourteen (14) individuals for two weeks to five (5) individuals for three days.

5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.
 - a. Plant Department Heads 3% (number involved) 10
 - b. Plant Manager 3%
 - c. Corporate Department Heads 2.8% (number involved) 7
 - d. Corporate Vice Presidents 2.7% (number involved) 2
(Division Heads)
 - e. Chief Nuclear Officer 2.1%
(Senior Vice President Engineering and Production)

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: INPO Accreditation
of Training progress.

2. Based on actual experience over the past several years,
about how often is this activity conducted? Every two (2)
years.

3. Operations/Construction areas covered: Various Training
program presently accredited by INPO.

4. Extent of the activity (how many people, for how long) Two
visits with three to six individuals each time for one week,
each visit.

5. Approximate percentage of total time (on an annual basis)
which the following managers must spend in direct involvement
before, during, and in response to the activity described in
Item #1.
 - a. Plant Department Heads 5.6% (number involved) 2
 - b. Plant Manager 0.35%
 - c. Corporate Department Heads 1.2% (number involved) 1
 - d. Corporate Vice Presidents 0.35% (number involved) 1
(Division Heads)
 - e. Chief Nuclear Officer 0.35%
(Senior Vice President, Production and Engineering)

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: Tech. Spec.
required QA Audits.

2. Based on actual experience over the past several years,
about how often is this activity conducted? 35 Times

3. Operations/Construction areas covered: Not applicable per
the guidelines.

4. Extent of the activity (how many people, for how long) Internal audits typically consist of two auditors
for 1 week.

5. Approximate percentage of total time (on an annual basis)
which the following managers must spend in direct involvement,
before, during and in response to the activity described in
Item #1.
 - a. Plant Department Heads 1% (number involved) 6
 - b. Plant Manager 2%
 - c. Corporate Department Mgrs. 1% (number involved) 10
 - d. Corporate Vice Presidents 1.5% (number involved) 6
(Division Heads)
 - e. Chief Nuclear Officer 2%
(Senior Vice President, Production and Engineering)

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: New York State
Department Of Environmental Conservation

2. Based on actual experience over the past several years,
about how often is this activity continued? One audit
per year

3. Operations/Construction areas covered: All areas of the
plant involved in waste discharge or hazardous material
storage.

4. Extent of the activity (how many people, for how long) One
person for one day.

5. Approximate percentage of total time (on an annual basis)
which the following managers must spend in direct involvement
before, during, and in response to the activity described in
Item #1.
 - a. Plant Department Heads 0.4% (number involved) 2
 - b. Plant Manager 0.05%
 - c. Corporate Department Heads 0.1% (number involved) 1
 - d. Corporate Vice Presidents 0.05% (number involved) 1
(Division Heads)
 - e. Chief Nuclear Officer _____
(Senior Vice President, Production and Engineering)

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: American Nuclear Insurers (ANI) Inspection

2. Based on actual experience over the past several years, about how often is this activity conducted? Six times per year.

3. Operations/Construction areas covered: Maintenance Radiological Protection, Environmental and Plant Safety.

4. Extent of the activity (how many people, for how long) Two individuals for three to four days.

5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.
 - a. Plant Department Heads 2.95% (number involved) 3
 - b. Plant Manager 0.4%
 - c. Corporate Department Heads 0.2% (number involved) 2
 - d. Corporate Vice Presidents _____ (number involved) _____
(Division Heads)
 - e. Chief Nuclear Officer _____
(Senior Vice President, Production and Engineering)

NRC regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: Utilities Mutual Insurers (UMI) Workmen's Compensation.

2. Based on actual experience over the past several years, about how often is this activity conducted? Twice each year.

3. Operations/Construction areas covered: Personnel Safety related to Workman's Compensation.

4. Extent of the activity (how many people, for how long) Two individuals for three days.

5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.
 - a. Plant Department Heads 2.8% (number involved) 1
 - b. Plant Manager 0.2%
 - c. Corporate Department Heads 2.4% (number involved) 1
 - d. Corporate Vice President _____ (number involved) _____
(Division Heads)
 - e. Chief Nuclear Officer _____
(Senior Vice President, Production and Engineering)

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: _____
OSHA Inspection

2. Based on actual experience over the past several years, about how often is this activity conducted? _____
Once in two years

3. Operations/construction area covered: Plant Safety for
personnel.

4. Extent of the activity (how many people, for how long) _____
One individual for one year.

5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.
 - a. Plant Department Heads 0.8% (number involved) 1
 - b. Plant Manager _____
 - c. Corporate Department Heads 0.4% (number involved) 1
 - d. Corporate Vice Presidents _____ (number involved) _____
(Division Heads)
 - e. Chief Nuclear Officer _____
(Senior Vice President, Production and Engineering)

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of inspection, audit or evaluation: Triennial Fire Protection Audit

2. Based on actual experience over the past several years, about how often is this activity conducted? Once in three years.

3. Operations/Construction areas covered: Fire Protection

4. Extent of the activity (how many people, for how long) Two individuals for a week.

5. Approximate percentage of total time (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.
 - a. Plant Department Heads 1% (number involved) 1
 - b. Plant Manager 0.03%
 - c. Corporate Department Heads 0.5% (number involved) 2
 - d. Corporate Vice Presidents _____ (number involved) _____
(Division Heads)
 - e. Chief Nuclear Officer _____
(Senior Vice President, Production and Engineering)