

UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D. C. 20555

November 30, 1992

Docket No. 50-244

Dr. Robert C. Mecredy Vice President, Nuclear Production Rochester Gas and Electric Corporation 89 East Avenue Rochester, New York 14649

Dear Dr. Mecredy:

SUBJECT: EVALUATION OF GINNA NUCLEAR POWER PLANT, 120-DAY RESPONSE TO SUPPLEMENT NO. 1 TO GENERIC LETTER 87-02 (TAC No. M69449)

Enclosure 1 provides the staff's evaluation of the Rochester Gas and Electric Corporation's (RG&E) response to Supplement No. 1 to Generic Letter (GL) 87-02 for the Ginna Nuclear Power Plant, which was submitted to the staff in a letter dated September 21, 1992.

Supplement No. 1 to GL 87-02 required that all addressees provide, within 120 days of the issue date of the supplement, either a commitment to use both the Seismic Qualification Utility Group (SQUG) commitments and the implementation guidance described in the Generic Implementation Procedure, Revision 2 (GIP-2), as corrected on February 14, 1992, and as supplemented by the staff's Supplemental Safety Evaluation Report No. 2 (SSER No. 2) on GIP-2, or else provide an alternative method for responding to GL 87-02. The supplement also required that those addressees committing to implement GIP-2 provide an implementation schedule, and provide the detailed information as to what procedures and criteria were used to generate the in-structure response spectra (IRS) to be used for USI A-46. In addition, the staff requested in SSER No. 2, that the licensees inform the staff in the 120-day response if they intend to change their licensing basis to reflect a commitment to the USI A-46 (GIP-2) methodology for verifying the seismic adequacy of mechanical and electrical equipment, prior to receipt of the staff's plant-specific safety evaluation resolving USI A-46.

Your response is unclear as to whether or not you intend to implement both the SQUG commitments and the implementation guidance. The staff interprets your response as a commitment to the entire GIP-2 including both the SQUG commitments and the implementation guidance, and therefore considers it acceptable. If the staff's interpretation is incorrect, then in accordance with Supplement No. 1 to GL 87-02, you should provide for a staff review as soon as practicable prior to implementing your alternative criteria and procedures for responding to GL 87-02. Additionally, you should not merely follow the August 21, 1992, SQUG letter for implementing GIP-2 as stated in its submittal, but should refer to Enclosure 2 to this letter which provides the staff's response to the SQUG letter. The implementation schedule proposed by RG&E is within the 3-year response period requested by the staff in Supplement No. 1 to GL 87-02 and is therefore acceptable.

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Your IRS (IRS) and your commitment to use the options provided in the GIP for defining seismic demand are acceptable since Ginna is a Category 2 (SEP) plant as identified in GL 87-02, Supplement No. 1. The IRS included in your licensing basis documents such as FSARs, USARs and other pertinent commitments related to IRS may be used as "conservative, design" IRS for resolution of USI A-46. Furthermore, if more than one set of IRS appear in the licensing basis documents, the more conservative set of spectra must be used to qualify for the definition of "conservative, design" IRS for the resolution of USI A-46 issues at Ginna. If the you intend to use the option of developing or using "median centered" IRS, you are requested to inform the NRC staff the approximate date by which such information will become available.

You indicated that you intend to change your licensing basis methodology, via 10 CFR 50.59, for verifying the seismic adequacy of new, replacement, and existing electrical and mechanical equipment prior to receipt of a final plant-specific SER resolving USI A-46. The staff recognizes that you may revise your licensing basis in accordance with 10 CFR 50.59 to reflect the acceptability of the USI A-46 (GIP) methodology for verifying the seismic adequacy of electrical and mechanical equipment covered by the GIP. However, if RG&E does not commit to implement both the SQUG commitments and the implementation guidance, and you have not committed to any acceptable alternative criteria and procedures, then the staff does not believe that it is feasible, at this time, for you to change your licensing basis in the manner described.

Sincerely,
Original signed by:
Allen R. Johnson, Project Manager
Project Directorate 1-3
Division of Reactor Projects I/II
Office of Nuclear Reactor Regulation

Enclosures:

1. Safety Evaluation

2. NRC Response dated 10/2/92 to Seismic Qualification Utility Group (SQUG)

cc w/enclosures: See next page

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* See Previous Concurrence

| OFFICE | PDI-3/kAy | PDI-3/PM | PDI-3/PM/ | *NRR-EMEB/BC | PD1-3/D |
|--------|-----------|---------------|-----------|--------------|----------|
| NAME | TClaff | RSkokowski:dt | AJohnson | JNorberg | WButler |
| DATE | 11/30/92 | 11/30/92 | 11/30/92 | 11/25/92 | 11/30/92 |

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Your in-structure response spectra (IRS) and your commitment to use the options provided in the GIP for defining seismic demand are acceptable since Ginna is a Category 2 (SEP) plant as identified in GL 87-02, Supplement No. 1. The IRS included in your licensing basis documents such as FSARs, USARs and other pertinent commitments related to IRS may be used as "conservative, design" IRS for resolution of USI A-46. Furthermore, if more than one set of IRS appear in the licensing basis documents, the more conservative set of spectra must be used to qualify for the definition of "conservative, design" IRS for the resolution of USI A-46 issues at Ginna. If you intend to use the option of developing or using "median centered" IRS, you are requested to inform the NRC staff the approximate date by which such information will become available.

You indicated that you intend to change your licensing basis methodology, via 10 CFR 50.59, for verifying the seismic adequacy of new, replacement, and existing electrical and mechanical equipment prior to receipt of a final plant-specific SER resolving USI A-46. The staff recognizes that you may revise your licensing basis in accordance with 10 CFR 50.59 to reflect the acceptability of the USI A-46 (GIP) methodology for verifying the seismic adequacy of electrical and mechanical equipment covered by the GIP. However, if RG&E does not commit to implement both the SQUG commitments and the implementation guidance, and you have not committed to any acceptable alternative criteria and procedures, then the staff does not believe that it is feasible, at this time, for you to change your licensing basis in the manner described.

Sincerely,

Allen R. Johnson, Project Manager

Project Directorate 1-3

Division of Reactor Projects I/II
Office of Nuclear Reactor Regulation

Enclosures:

1. Safety Evaluation

2. NRC Response dated 10/2/92 to Seismic Qualification Utility Group (SQUG)

cc w/enclosures: See next page cc:

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