



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

EVALUATION OF ROCHESTER GAS AND ELECTRIC CORPORATION'S

120-DAY RESPONSE TO SUPPLEMENT NO. 1

TO GENERIC LETTER 87-02

FOR THE GINNA NUCLEAR POWER PLANT

DOCKET NO. 50-244

1.0 INTRODUCTION

By letter dated September 21, 1992, the Rochester Gas and Electric Corporation, the licensee, submitted its response to Supplement No. 1 to Generic Letter (GL) 87-02, "Verification of Seismic Adequacy of Mechanical and Electrical Equipment in Operating Reactors, Unresolved Safety Issue (USI) A-46," dated May 22, 1992, for the Ginna Nuclear Power Plant. In this supplement, the staff requested that the licensee submit the following information within 120 days of the issue date of the supplement:

1. A statement whether you commit to use both the Seismic Qualification Utility Group (SQUG) commitments and the implementation guidance provided in the Generic Implementation Procedure, Revision 2 (GIP-2) as supplemented by the staff's Supplemental Safety Evaluation Report No. 2 (SSER No. 2) for the resolution of USI A-46. In this case, any deviation from GIP-2, as supplemented by the SSER No. 2, must be identified, justified, and documented. If you do not make such a commitment, you must provide your alternative for responding to GL 87-02.
2. A plant-specific schedule for the implementation of the GIP and submission of a report to the staff that summarizes the results of the USI A-46 review, if you are committing to implement GIP-2. This schedule shall be such that each affected plant will complete its implementation and submit the summary report within 3 years after the issuance of the SSER No. 2, unless otherwise justified.
3. 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 as requested in the SSER No. 2. The licensee's IRS are considered acceptable for USI A-46 unless the staff indicates otherwise during a 60-day review period.

In addition, the staff requested in SSER No. 2 that the licensee inform the staff, in the 120-day response, if it intends to change its 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



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the staff's plant-specific safety evaluation resolving USI A-46. This report provides the staff's evaluation of the licensee's response.

2.0 EVALUATION

With regard to Item 1, the licensee stated that it "...commits to the SQUG commitments set forth in the GIP in their entirety, including the clarifications, interpretations, and exceptions identified in SSER-2 as clarified by the August 21, 1992, SQUG letter responding to SSER-2." The licensee also stated that, "For the remaining non-commitment sections of the GIP (i.e., GIP implementation guidance), RG&E expects to, in general, follow the suggested methods for implementing the applicable commitments."

The licensee's response is unclear as to whether or not the licensee intends to implement both the SQUG commitments and the implementation guidance. In accepting GIP-2 as a method for resolving USI A-46, it was the staff's understanding that the SQUG members who chose to implement GIP-2 would essentially use the entire procedure, including the SQUG commitments, which contain the general programmatic objectives and goals, and the implementation guidance, which contains the specific criteria and procedures to be used for the resolution of USI A-46. This understanding was the basis for the staff's position; which was stated in SSER No. 2, that if the licensee commits to use GIP-2 for the implementation of USI A-46, it must commit to both the SQUG commitments and the use of the entire implementation guidance provided in GIP-2, unless otherwise justified to the staff. In order to allow some flexibility in implementing GIP-2, the staff acknowledged in the supplement to GL 87-02 that SQUG members who commit to GIP-2 (both the SQUG commitments and the implementation guidance) may deviate from it provided that such deviations are identified, documented and justified. However, it was also indicated in SSER No. 2 that if a licensee uses methods that deviate from the criteria and procedures described in the SQUG commitments and in the implementation guidance of GIP-2 without prior NRC approval, the staff may find the use of such methods unacceptable with regard to satisfying the provisions of GL 87-02.

In light of the above, the staff interprets the licensee's response to Supplement No. 1 to GL 87-02 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, the licensee should provide for staff review, as soon as practicable prior to implementation, its alternative criteria and procedures for responding to GL 87-02.

In addition, Enclosure 2 provides the staff's response, dated October 2, 1992, to the August 21, 1992, SQUG letter. The staff does not concur with all of the SQUG's clarifications and positions stated in that letter, and thus, the licensee should not use the August 21, 1992, letter as guidance in responding to Supplement No. 1 to GL 87-02. The licensee should refer to Enclosure 2 for the staff's position on the SQUG letter.

With regard to Item 2, the licensee stated that it will submit a summary report to the NRC summarizing the results of the USI A-46 program at Ginna Nuclear Power Plant by May 22, 1995. This submittal date is within the 3-year response period requested by the staff and is therefore acceptable.

With regard to Item 3, the licensee stated it "will use the options provided in the GIP for defining seismic demand (i.e., appropriate median-centered and conservative, design IRS, depending on the building, the location of equipment in the building, and equipment characteristics)." Since Ginna is identified as a Category 2 (SEP) plant in Generic Letter 87-02, Supplement No. 1, we conclude that the licensee response is adequate and acceptable. Furthermore, based on the provisions stipulated in GL 87-02, Supplement No. 1, the IRS included in the licensing basis documents such as Final Safety Analysis Reports (FSARs), Update Safety Analysis Reports (USARs), and other pertinent commitments related to IRS may be used as "conservative, design" spectra for resolution of USI A-46 issues at Ginna Station. 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 licensee intends to use the option of developing or using "median-centered" IRS, the licensee is requested to inform the NRC staff of the approximate date by which such information will become available.

The licensee indicated that it intends to change its 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 the licensee may revise its 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 the licensee does not commit to implement both the SQUG commitments and the implementation guidance, and the licensee has not committed to any acceptable alternative criteria and procedures, then the staff does not believe that is feasible, at this time, for the licensee to change its licensing basis in the manner described.

3.0 CONCLUSIONS

The staff interprets the licensee's response to Supplement No. 1 to GL 87-02 as a commitment to the entire GIP-2 including both the SQUG commitments and the implementation guidance, and therefore considers it acceptable. If the licensee does not commit to implement the entire GIP-2, then in accordance with Supplement No. 1 to GL 87-02, the licensee should provide for staff review, as soon as practicable prior to implementation, its alternative criteria and procedures for responding to GL 87-02. Additionally, the licensee should not merely follow the August 21, 1992, SQUG letter for

implementing GIP-2, but should refer to Enclosure 2 for the staff's response to the SQUG letter.

The implementation schedule proposed by the licensee is within the 3-year response period requested by the staff in Supplement No. 1 to GL 87-02 and is therefore acceptable.

The licensee's IRS and their 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 the licensing basis documents such as FSAR's, USAR's 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 licensee intends to use the option of developing or using "median centered" IRS, the licensee will be requested to inform the NRC staff the approximate date by which such information will become available.

The staff recognizes that the licensee may revise its 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 the licensee does not commit to implement both the SQUG commitments and the implementation guidance, and the licensee has not committed to any acceptable alternative criteria and procedures, then the staff does not believe that it is feasible, at this time, for the licensee to change its licensing basis in the manner described.

Principal Contributors:

P. Y. Chen
J. S. Ma
J. C. Stewart
M. McBrearty

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