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 probabilistic risk assessment.

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ROBERT C. MECREDDY  
Vice President  
Nuclear Operations

April 19, 1996

U.S. Nuclear Regulatory Commission  
Document Control Desk  
Attn: Allen R. Johnson  
Project Directorate I-1  
Washington, D.C. 20555

Subject: Generic Letter 88-20, Response to Request for Additional Information (TAC No. M74414)  
Rochester Gas & Electric Corporation  
R.E. Ginna Nuclear Power Plant  
Docket No. 50-244

- Reference: (a) Letter from A.R. Johnson, NRC, to R.C. Mecreddy, RG&E, Subject: *Ginna Probabilistic Risk Assessment Project Report of March 15, 1994, to the NRC in Response to Generic Letter No. 88-20; Request for Additional Information (TAC No. M74414)*, dated February 23, 1996.
- (b) Letter from R.C. Mecreddy, RG&E, to A.R. Johnson, NRC, Subject: *Level 2 Probabilistic Risk Assessment*, dated March 10, 1995.

Dear Mr. Johnson,

By Reference (a), the NRC forwarded a request for additional information (RAI) related to the RG&E submittal of a Level II Probabilistic Safety Assessment (PSA) for Ginna Station per Generic Letter 88-20. The RAI asked for a written response to the NRC questions within 60 days of receipt of the letter. This letter provides RG&E's response to the RAI.

Since the submittal of the Ginna Station PSA in 1994, RG&E has made, and is making, significant changes to the plant, particularly during the 1996 Refueling Outage. These changes include steam generator replacement, conversion to improved standard technical specifications (including the associated surveillance testing interval changes), reduction in  $T_{avg}$ , and a change from an 12 month to 18 month fuel cycle. RG&E has also developed additional insights into the PSA via a detailed review and evaluation as a result of adding additional members to the PSA staff (see Ref. (b)). This has resulted in the development of several improvements to the PSA models in addition to the physical plant changes discussed above.

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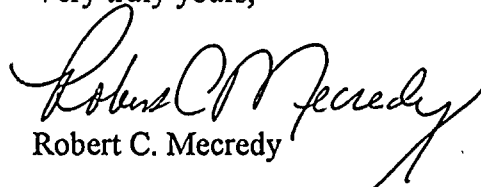
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As such, the PSA re-evaluation of Ginna Station has been delayed beyond our original projections. All PSA efforts are now being directed towards supporting implementation of the Maintenance Rule as required by July 10, 1996. Attempting to respond to the RAI at this time would be detrimental to providing this necessary support. In addition, attempting to quantify the impact of several issues as requested by the staff in Reference (a) would not be in the best interest of the NRC or RG&E since the fault tree models have undergone significant revision since the 1994 submittal. Therefore, RG&E proposes the following with respect to responding to the RAI:

- a. A summary report of the new Level I PSA for Ginna Station will be submitted to the NRC by July 31, 1996. This report will address those questions contained in Enclosures 1 (Level 1) and 2 (Human Reliability Analysis) to Reference (a).
- b. A summary report of the new Level II PSA for Ginna Station will be submitted to the NRC by November 15, 1996. This report will address those questions contained in Enclosure 3 (Level 2) to Reference (a).

If you have any further questions or comments, please contact George Wrobel, Manager of Nuclear Safety and Licensing, at (716) 724-8070.

Very truly yours,

  
Robert C. Mecredy

xc: U.S. Nuclear Regulatory Commission  
Mr. Allen R. Johnson (Mail Stop 14B2)  
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Washington, D.C. 20555

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Ginna Senior Resident Inspector

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