

ENCLOSURE 2



ROCHESTER GAS AND ELECTRIC CORPORATION • 89 EAST AVENUE, ROCHESTER, N.Y. 14649-0001

TELEPHONE
AREA CODE 716 546-2700

October 20, 1989

U.S. Nuclear Regulatory Commission
Attn: Mr. William T. Russell
Regional Administrator
Region I
475 Allendale Road
King of Prussia, PA 19406

Dear Mr. Russell:

The enclosure to this letter provides comments on the NRC Systematic Assessment of Licensee Performance (SALP) report for Ginna Station. Overall, the report is a good and fair assessment of our nuclear operations, with some comments and clarification offered on specific issues in the attachment. We concur with the SALP Board assessment that further gains in overall performance can be achieved by improving our management systems for identifying and correcting deficiencies. To this end we are committed to more effective supervisory oversight, strengthening administrative controls, and a quality organization with a sharper focus on performance improvement.

Thank you for the extensive effort made to provide RG&E with your assessment of our corporate performance, and for the opportunity to discuss the report with NRC personnel on August 24.

Very truly yours,

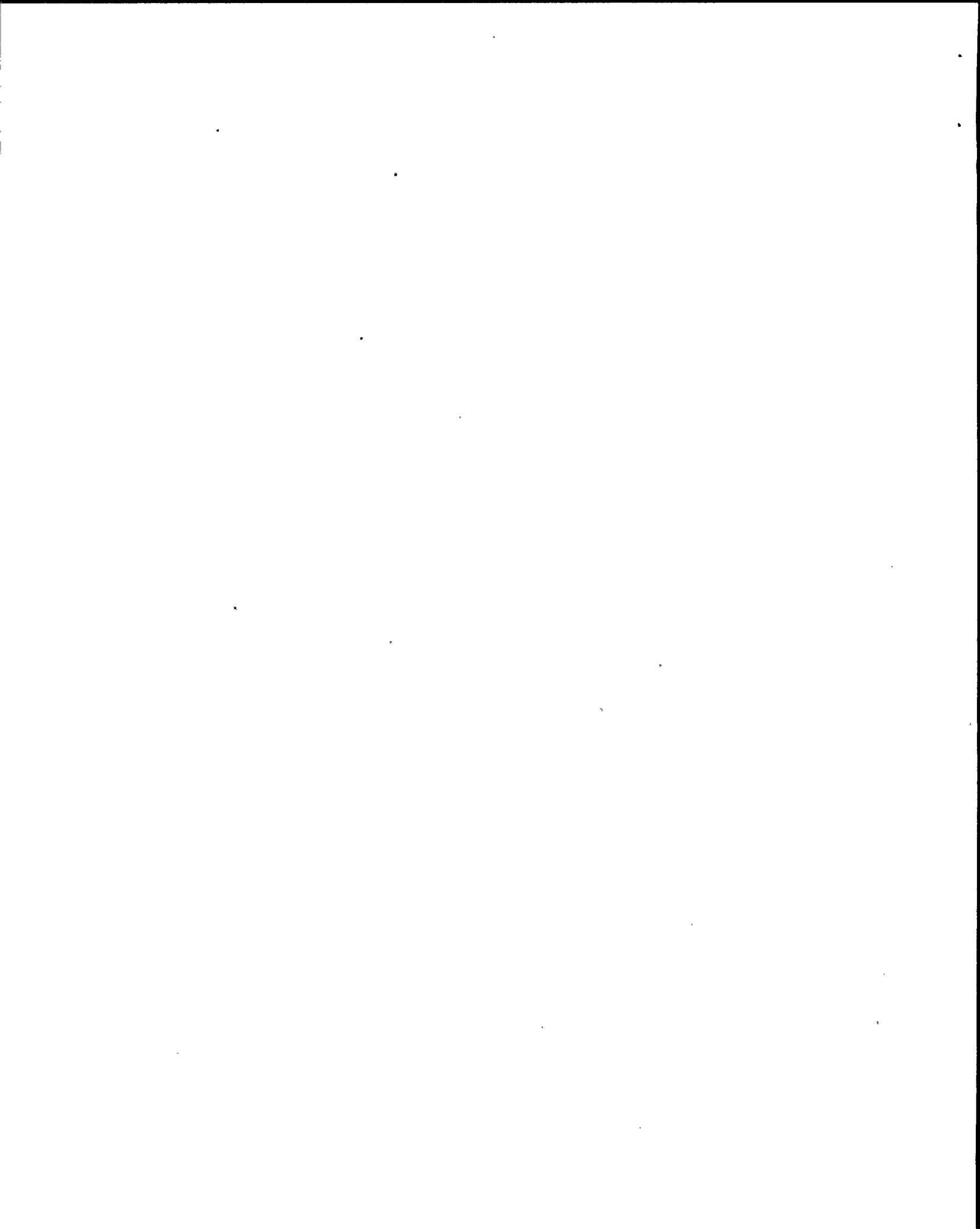
A handwritten signature in cursive script that reads 'Robert C. Mecredy'.

Robert C. Mecredy
General Manager, Nuclear Production

Enclosure

xc: Document Control Desk (original)
Ginna Resident Inspector

8910250226



ENCLOSURE

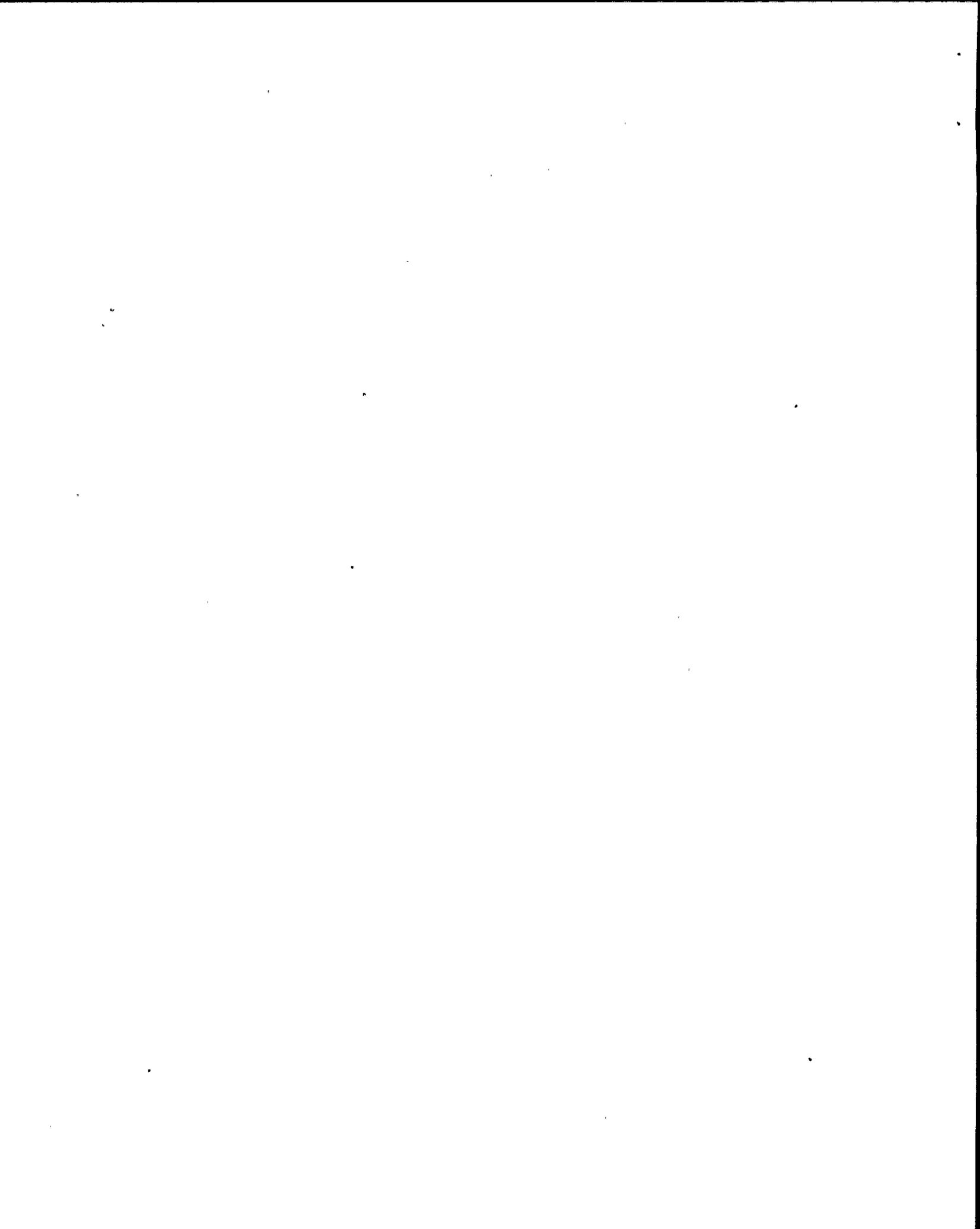
COMMENTS ON

SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE

INSPECTION REPORT 50-244/87-99

R. E. Ginna Nuclear Power Plant
Rochester Gas and Electric Corporation

Assessment Period December 1, 1987 - May 31, 1989



Introduction

In order to achieve the organizational performance level anticipated in our Nuclear Mission Statement, we believe that "We must protect the health and safety of the community and our employees by setting safe operation as our highest priority" and "We must be efficient, well-managed, disciplined and maintain high standards of performance." Our dedicated and experienced staff, working to this philosophy, continues to be the driving force behind our excellent operating record. We recognize that in several areas improvements can be made and, in fact, many programmatic upgrades and management oversight enhancements are well underway. We concur with the SALP Board assessment that further gains in overall performance can be achieved by improving our management systems for identifying and correcting deficiencies. To this end we are committed to more effective supervisory oversight, strengthening administrative controls and a quality organization with a sharper focus on performance improvement. The Board's recommendations are being evaluated and RG&E will take appropriate and timely action. The comments on each section, which follow, provide additional information about specific issues to clarify RG&E's nuclear operation as detailed in the SALP report.

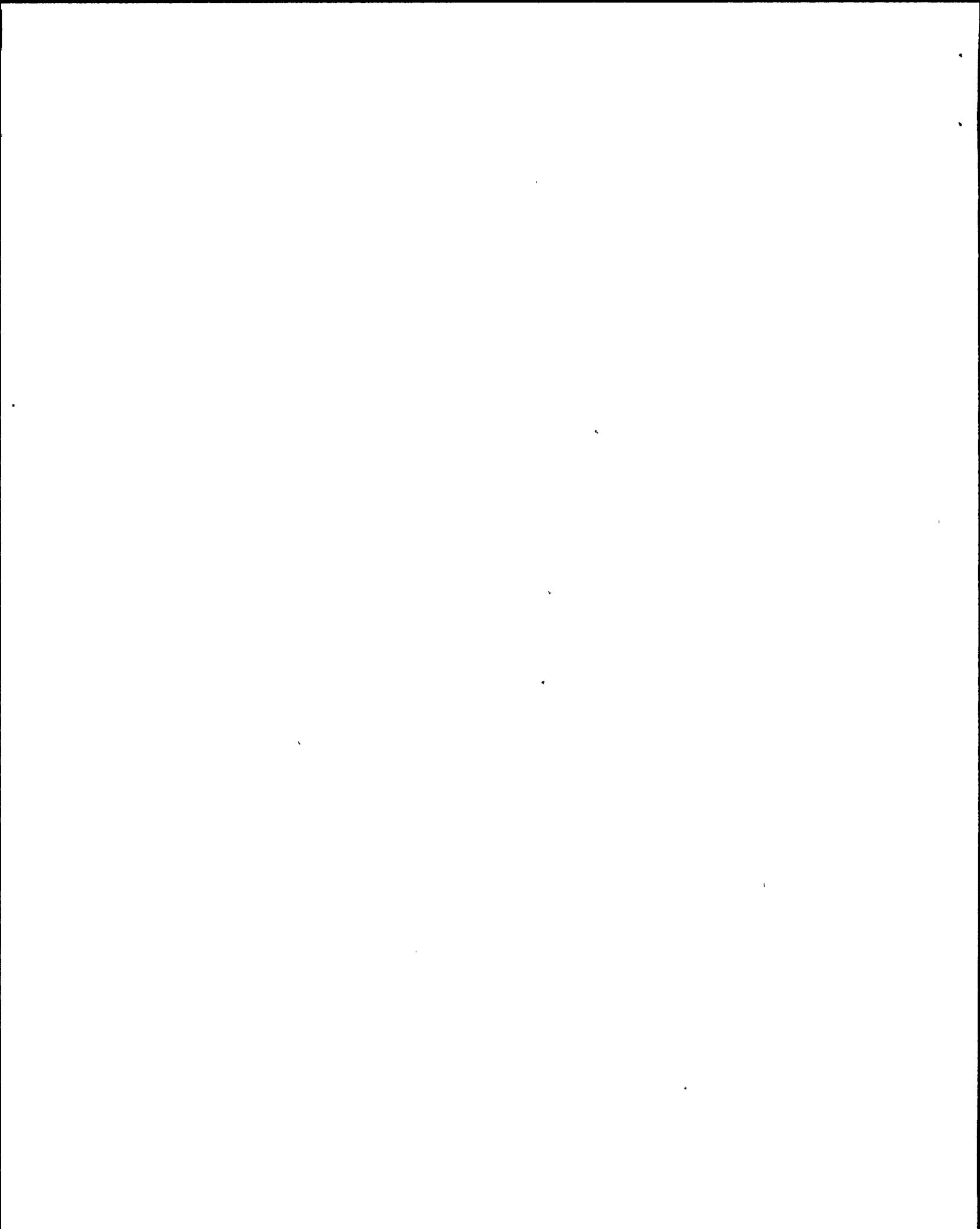
Plant Operations

Management oversight and control of plant operations is being strengthened by communicating management expectations through a series of meetings with managers and supervisors, by emphasizing the importance of having first-line supervisors monitoring work activity in the field, and through a major procedures upgrade program. In addition, we have begun implementation of a comprehensive commitment tracking program. Housekeeping standards will be formalized and responsibility assigned to provide more consistent performance in this area.

We have made excellent progress in improving the interface between plant operations and corporate engineering and are continuing those efforts. In particular, we have assessed the program for turnover of modifications and have identified enhancements, as discussed with your Staff at our October 3, 1989 meeting.

Radiological Protection

To improve effectiveness in the radiological protection area a number of actions are being taken. Radiological protection standards are undergoing review and enhanced standards will be established. We are upgrading the radiological protection program and placing greater emphasis on individual responsibility. The new program calls for increasing supervisory oversight of field



activities and stresses procedural compliance. In addition, a QC Coordinator has been added to the Chemistry group to strengthen the laboratory QA/QC program, and a Director of Corporate Radiation Protection has been hired to supplement corporate oversight of this function.

Maintenance/Surveillance

RG&E is participating in the EPRI sponsored Reliability Centered Maintenance Program developed to achieve more effective plant maintenance across the industry. Actions are being taken to build on the strength of our technically capable and highly motivated maintenance staff. We are working to improve the interface between the maintenance and quality control organizations. Part of this improvement process is to involve quality control personnel in work preplanning. A major procedures upgrade project is underway and we will continue to reinforce procedural adherence.

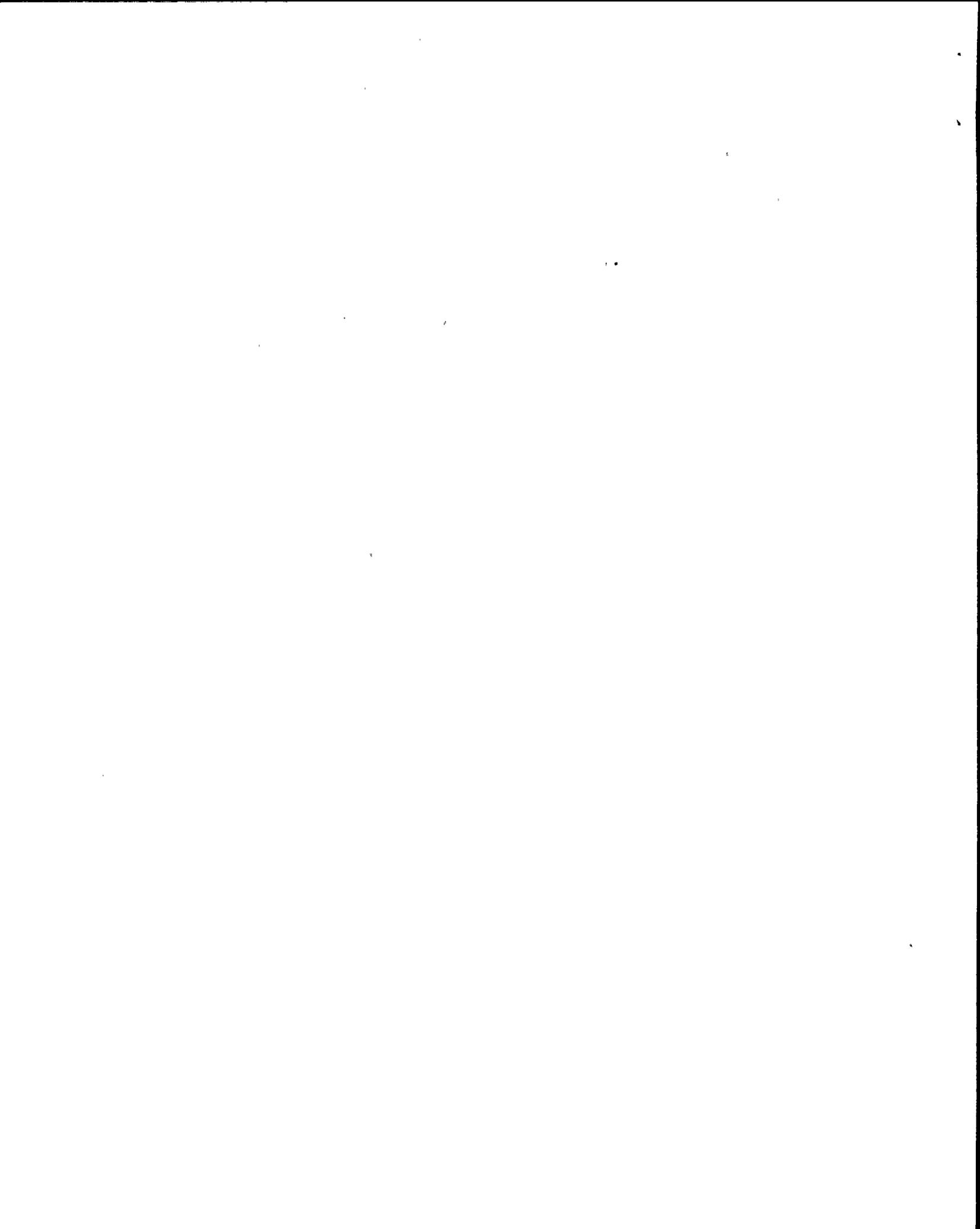
As described in our meeting of October 3, 1989, we note that maintenance of the offsite power system is preplanned and conducted by the RG&E Electric Substations Department and includes plant notification and work start authorization. Additional measures have been implemented recently to provide greater assurance that system alignment is maintained following maintenance activity associated with offsite power systems at Station 204 and Station 13A.

Emergency Preparedness

RG&E takes pride in its excellent Emergency Preparedness program. To ensure that this high quality program is sustained, we have provided additional staffing in the EP organization. We note that as an example of the innovative approach taken in our EP program, Rochester Institute of Technology students were used as news media personnel in the 1988 exercise. The students injected a new enthusiasm into an activity which had become somewhat routine to regular news media staff.

Security

Our security force continues to be well managed, effectively trained and highly motivated as pointed out in your assessment. We concur that our physical security system requires some improvement and we have taken immediate action to address the deficiencies. We are in the process of conducting a comprehensive assessment of all station security programs and systems. The Security Plan is currently being rewritten to provide an accurate, consistent and up-to-date plan.



The Director of Corporate Security is directly involved in overview and consultation with plant security. Nuclear security programs receive regular and frequent attention. The Director is in daily communication with the on-site Supervisor of Nuclear Security, providing management guidance on regulatory and administrative issues and in areas of special concern. To strengthen the oversight effort, Corporate Security management is preparing an action plan, with particular emphasis on the physical equipment performance.

Further, we will investigate providing additional technical assessment capability in the Quality Performance audit process.

A meeting with your staff will be scheduled in late November or early December to discuss the Security assessment and response plan and to provide an update on the Security Plan revision process.

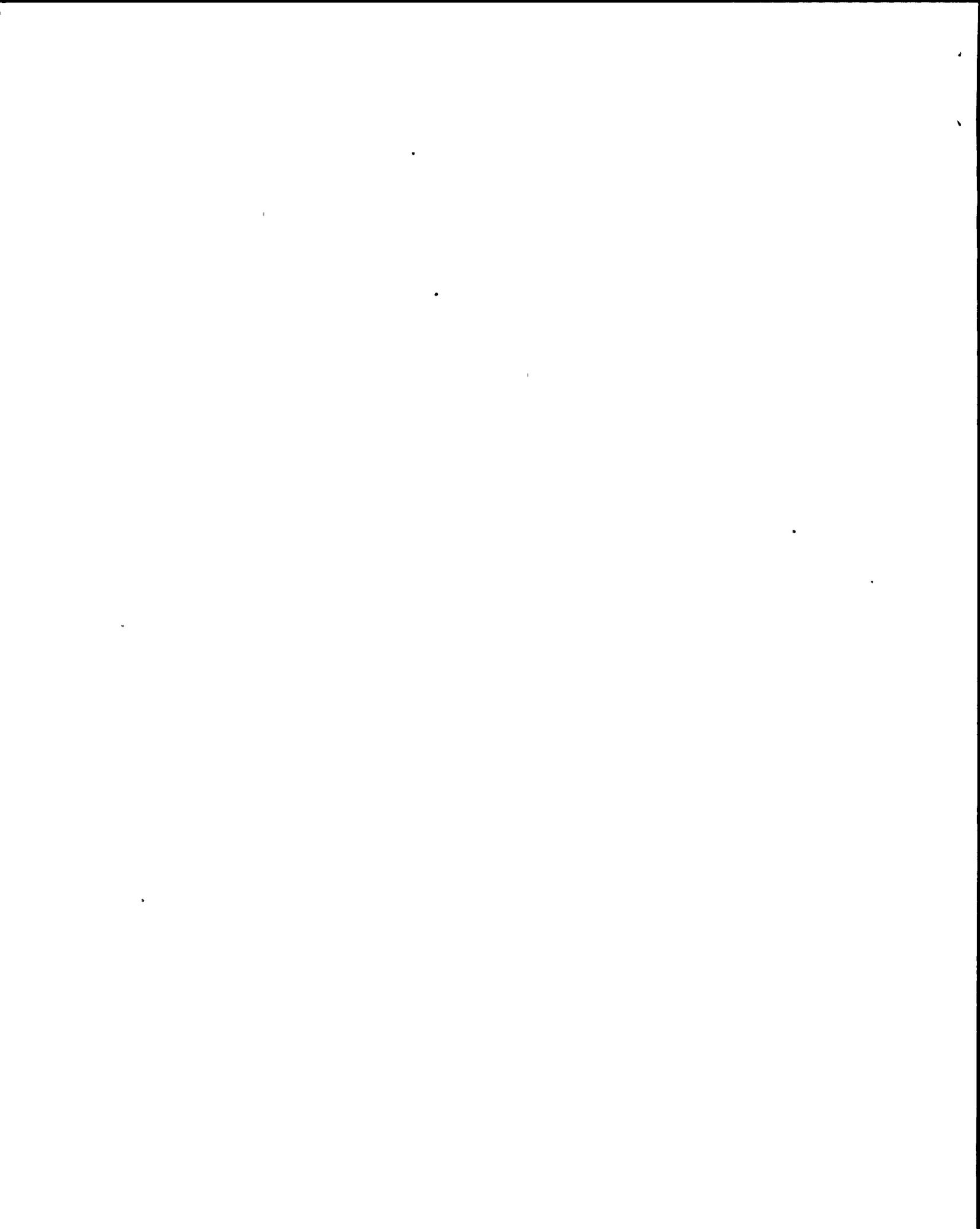
Engineering/Technical Support

Our experienced engineering staff has been augmented with a substantial number of additional people, and more additions have been authorized to provide increased technical support to the plant. An engineering scheduling system has been developed to assist with preplanning of modifications and other engineering activities, with cutoff dates established for modification packages to reach the field in sufficient time for planning of activities at the plant.

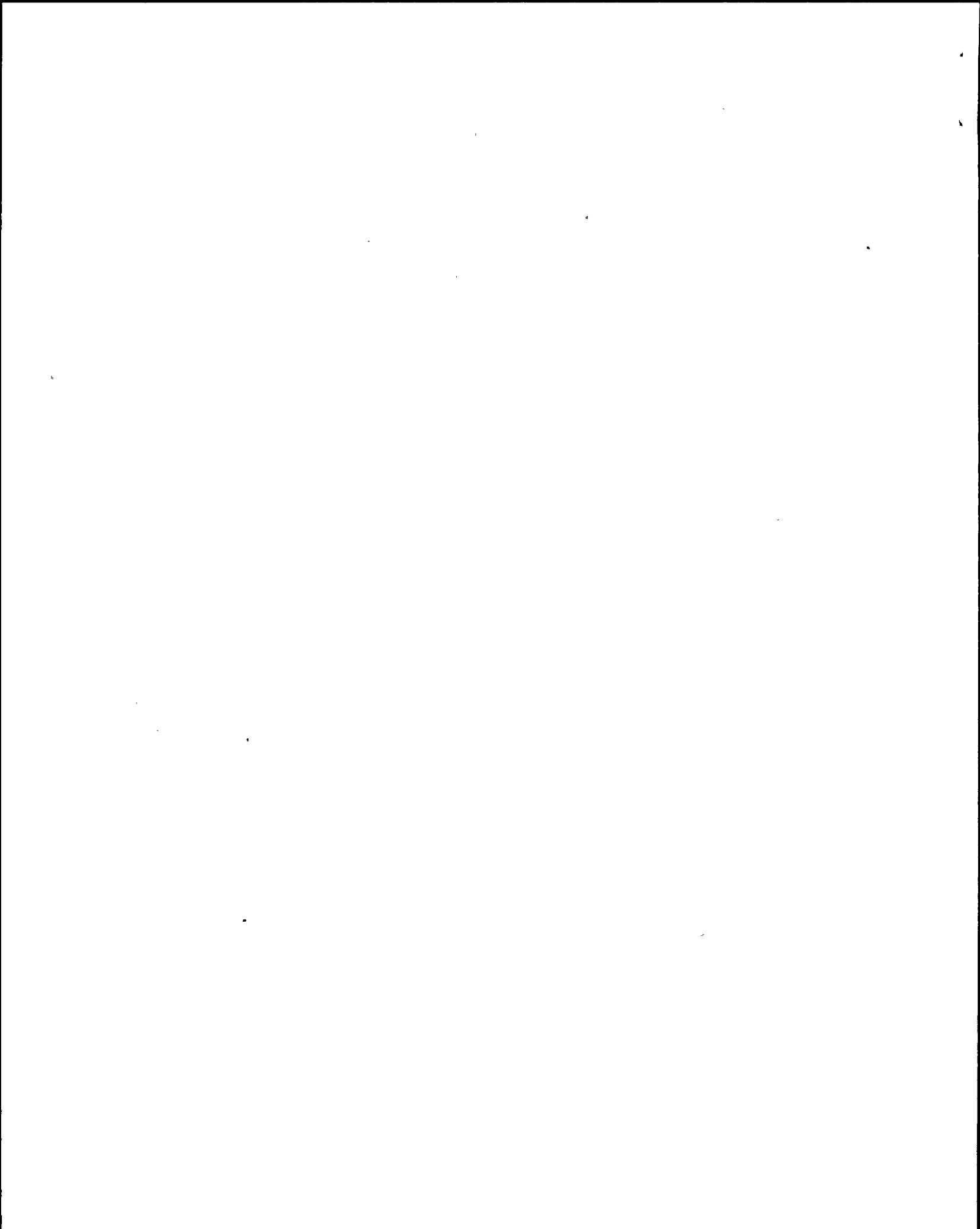
As described in our meeting of October 3, 1989, there was extensive communication between engineering and plant operations on the SI and AMSAC modifications; however, we are reviewing and enhancing the control process, particularly the turnover of modifications to the plant operations for use.

Safety Assessment/Quality Verification

The quality organization has gone through a transitional period during the past year, resulting in a consolidated Quality Performance Department, headed by an experienced nuclear manager, and reporting to the Senior Vice President, Production and Engineering, rather than the President. The new reporting structure will allow a closer working relationship with the managers from nuclear production and engineering for better communication on mutual concerns. In addition, we have appointed a new manager for the site QC organization, who is a senior mechanical engineer, highly respected at the plant and in engineering.



In order to use the quality organization more effectively as a management tool, we are taking steps to improve both the information generated by the quality organization and its presentation to management. A performance based monitoring program is being developed to augment the audit program. We intend to strengthen the technical expertise available for audits and other quality reviews through the use of consultants, in-house expertise from the line organization, and experts from other utilities. A new Senior Quality Performance Analyst position has been established with responsibility for assessments of performance, and a QC Inspection Foreman position has been added to allow better coordination of daily inspection activities. A meeting has been scheduled with the Staff for October 24, 1989 to discuss our program plans in detail.



ENCLOSURE 3

SALP MANAGEMENT MEETING ATTENDEES

Rochester Gas and Electric Corporation

R. Kober, President and Chief Operating Officer
R. Smith, Senior Vice President, Production and Engineering
R. Henderson, Senior Vice President, Controller and Chief Financial Officer
D. Laniak, Senior Vice President, Gas and Electric Distribution and Corporate Planning
D. Heiligman, Vice President, Secretary and Treasurer
R. Mecredy, General Manager, Nuclear Production
B. Snow, Chief Engineer
W. McCoy, Department Manager, Quality Performance
S. Spector, Plant Manager, Ginna
T. Marlow, Superintendent, Ginna Support Services
J. Widey, Superintendent, Ginna Production
T. Powell, Manager, Risk Management Department
J. Edmunds, Manager, Public Affairs
M. Power, Public Relations
R. Peck, Public Relations

U.S. Nuclear Regulatory Commission

W. Kane, Director, Division of Reactor Projects (DRP)
J. Johnson, Chief, Projects Branch No. 3, DRP
C. Cowgill, Chief, Reactor Projects Section 4B, DRP
E. McCabe, Chief, Reactor Projects Section 3B, DRP
C. Marschall, Senior Resident Inspector
N. Perry, Resident Inspector
R. Wessman, Project Directorate, PD I-3, Office of Nuclear Reactor Regulation (NRR)
A. Johnson, Project Manager, PD I-3, NRR

