

A 09/08/78

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RESPONSE TO NRC LTR DTD 08/17/78... FURNISHING INFO CONCERNING SYSTEMATIC  
EVALUATION PROGRAM DOCUMENTATION PROCEDURES AND THE RESOLUTION OF EIGHT  
"ESSENTIALLY COMPLETE TOPICS"... W/ATT SUPPORTING INFO.

PLANT NAME: RE GINNA -- UNIT 1

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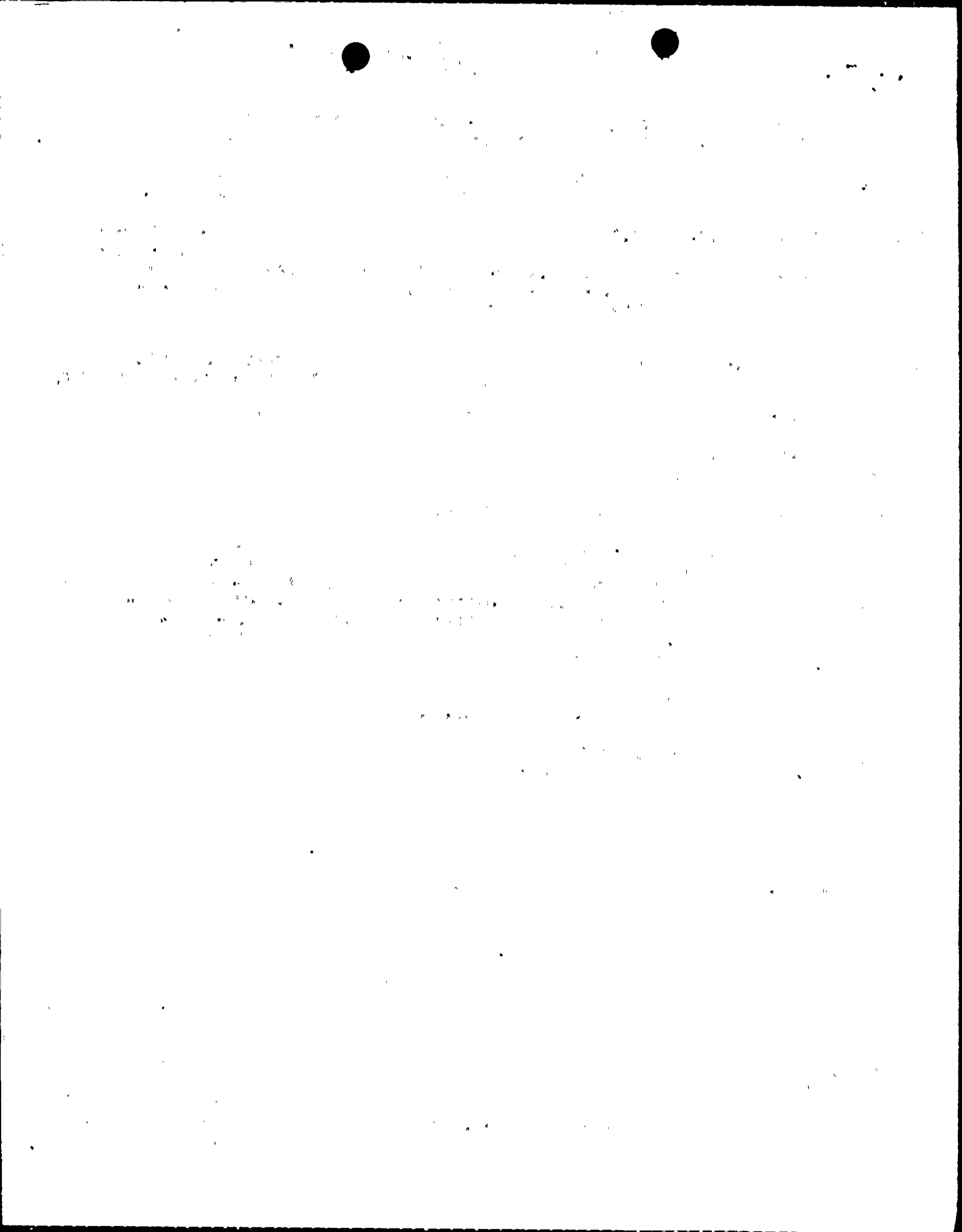
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LEON D. WHITE, JR.  
VICE PRESIDENT

TELEPHONE  
AREA CODE 716 546-2700

September 5, 1978

Director of Nuclear Reactor Regulation  
Attention: Mr. D.L. Ziemann, Chief  
Operating Reactors Branch No. 2  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Subject: SEP Topics III - 10.C, IV-1A, IV-3, V-9, VI-7.A.2,  
VI-7.D, VII-1.B, XVII  
R.E. Ginna Nuclear Power Plant  
Docket No. 50-244

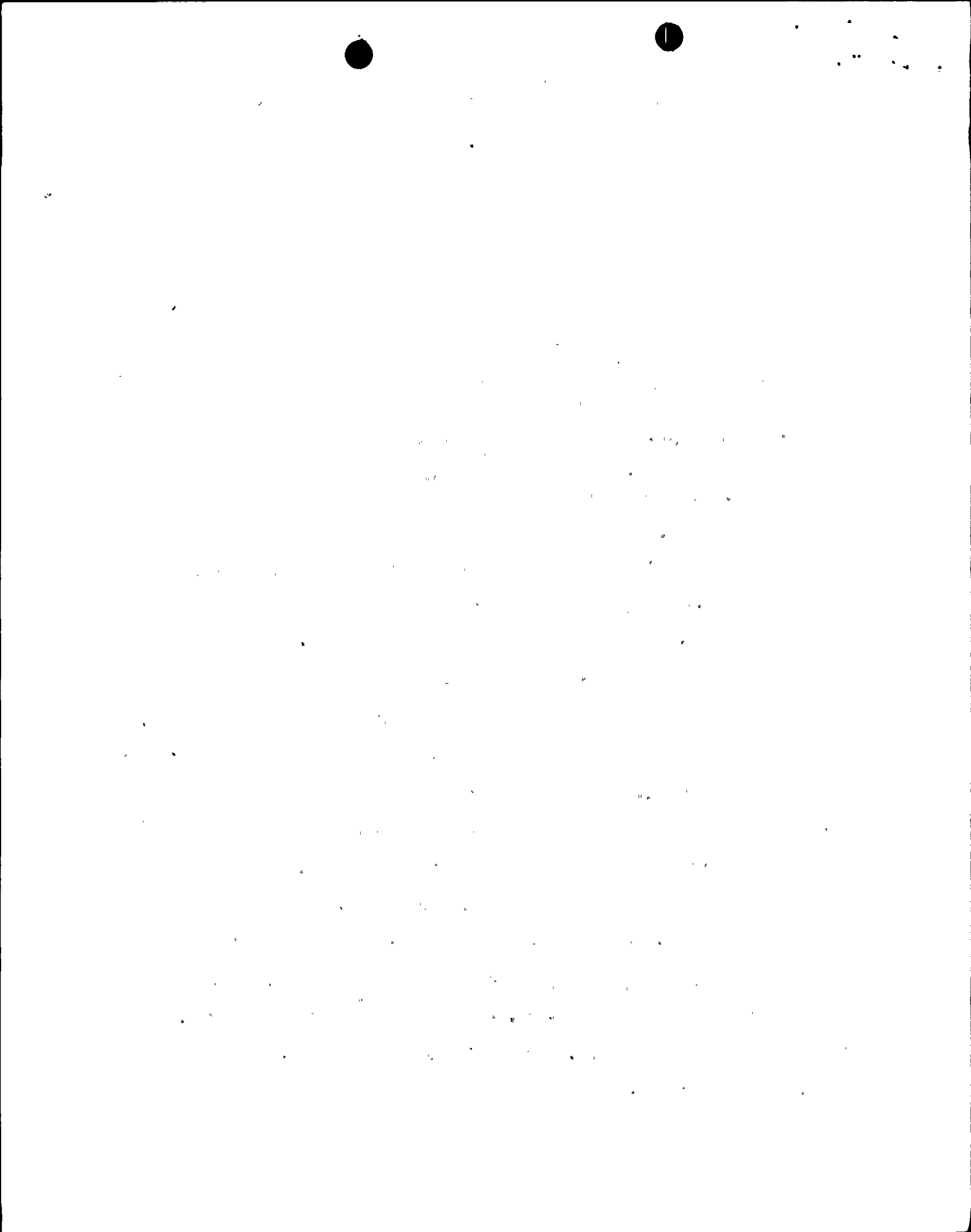
Dear Mr. Ziemann:

This letter is in response to a letter from Darrell G. Eisenhut, Assistant Director for Systems and Projects, dated August 17, 1978, regarding Systematic Evaluation Program (SEP) documentation procedures and the resolution of eight "essentially complete topics".

We have reviewed the Staff assessments with respect to the facts relating to Ginna. Topics III-10.C, IV-3, and V-9 are applicable only to Boiling Water Reactors and we, therefore, have no comment on their assessments. Topics VI-7.D and VII-1.B are generic in nature and contain no references to specific features of Ginna and we, therefore, have no corrections or additional information on their assessments. We have noted, however, that although these specific topics are resolved, the subjects will apparently be reviewed as a part of other topics. The remaining topics, IV-1.A, VI-7.A.2, and XVII address Ginna specifically and our comments are included in the attachment to this letter.

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We have one suggestion as to how the Staff assessments can be improved. One of the major purposes of SEP was to establish a sound documentation basis on which future reviews and decisions could be based. To do this, it seems to us paramount that each assessment include references to all information presently on the docket that is applicable. The fact that the assessments supplied by the Staff have few if any references reduces their value to future reviewers. We, therefore, encourage the Staff to reissue these assessments with adequate reference materials incorporated. We make this suggestion recognizing that these topics have, in general, little safety significance. But we believe it important to set the precedent of providing well referenced assessments as opposed to general discussions.

We also encourage the Staff to complete the remaining five topics which were defined as "essentially complete" at our May 31, 1978 meeting.

Should you have any questions regarding our comments on the Staff assessments, please contact us.

Very truly yours,



L.D. White, Jr.

Attachment

## ATTACHMENT

1. Topic IV-1.A Operation with less than all loops in service  
The assessment for Ginna should be revised. In accordance with Technical Specification 3.1.1.1.c, Ginna may operate with one pump in service if the reactor power is not above 130 MWt (8.5%). Several transients have been evaluated at one loop conditions. These may be found in the Ginna FSAR; the Technical Supplement Accompanying Application to Increase Power, February 1971; and Application for Amendment to Operating License, September 22, 1975. Although no LOCA analysis has been performed at 8.5% power, experience indicates that the results of such an analysis would be to demonstrate only minor consequences due, for example, to reduced decay heat and fuel temperatures.
2. Topic VI-7.A.2 Upper Plenum Injection  
The Staff assessment on this topic is incomplete. Specific references should be included for the analyses. In addition, interim analysis of the impact of upper plenum injection was performed by Exxon Nuclear Company for Ginna and was submitted by RG&E on May 22, 1978. This analysis yielded a temperature decrease of 15°F.
3. Topic XVII Operational QA Program  
The Staff references a "Safety Evaluation Report, 9/30/74" for approval of the Ginna QA Program. According to our records, no such Evaluation has been supplied to RG&E. Rather,

by letter dated October 2, 1974 from Karl R. Goller, Assistant Director for Operating Reactors, to Edward R. Nelson, President, RG&E, the Staff approved the Ginna QA Program. If a Safety Evaluation Report is available, we would appreciate receiving a copy. RG&E has submitted revisions to the Ginna Operational QA Program since that time but has not received a response. These revisions were submitted as Amendments No. 6 and No. 7 to Application to Convert Provisional Operating License to Full-Term Operating License on November 1, 1974 and January 30, 1976, respectively.



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