

October 31, 1989

Docket No. 50-244

Rochester Gas and Electric Corporation
ATTN: Mr. Robert C. Mecredy
General Manager
Nuclear Production
49 East Avenue
Rochester, New York 14649

Gentlemen:

SUBJECT: 10 CFR 50.54(p) SUBMITTAL - R.E. GINNA NUCLEAR POWER PLANT

This is in response to your letter of October 12, 1988, regarding changes to the R.E. Ginna Nuclear Power Plant Security Plan and Security Force Training and Qualification (T&Q) Plan.

We have reviewed the information contained in these plan revisions and have determined that portions of the revisions are consistent with the provisions of 10 CFR 50.54(p) and are considered acceptable.

However, certain other portions of the revisions are not considered acceptable for the reasons stated in the enclosure to this letter. For those portions, you are to modify your plans accordingly or revert to previously-approved plan wording as discussed in the enclosure. Corrected page revisions should be submitted to this office within 30 days of receipt of this letter.

The enclosures to your letter are being withheld from public disclosure since they contain Safeguards Information and must be protected in accordance with 10 CFR 73.21.

E. D. Sylvester (215-337-5308) is our contact should there be any questions concerning this matter.

Sincerely,

RS

Ronald R. Bellamy, Chief
Facilities Radiological Safety
and Safeguards Branch
Division of Radiation Safety
and Safeguards

Enclosure: As Stated

cc: See Next Page

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GINNA - SG REVIEW REPORT - 0001.0.0

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CHANGES NOT CONSIDERED ACCEPTABLE

<u>Page</u>	<u>Section</u>	<u>Comment</u>
1:4 and 1:5	1.3.1, Security Plan	The revision to the Security Plan deletes the commitment that the psychological screening test be administered by a professional member of the Corporate Health Services Division staff. This is a decrease in the effectiveness of the Plan because the Plan no longer specifies who evaluates the tests. NRC guidance (Review Guideline No. 1) requires that the results of psychological tests administered for the purpose of personnel screening for access authorization be evaluated by a qualified psychologist or psychiatrist.
1:5	1.3.1, Security Plan	The previous revision of the Security Plan requires that all contractor personnel be screened for access authorization in accordance with Section 4.3 of ANSI 18.17-1973. The current revision also permits personnel reliability to be established by three years of trustworthy employment in lieu of meeting the requirements of Sections 4.3(1) and 4.3(2) of ANSI 18.17-1973. This alternative is considered a decrease in the effectiveness of the screening program and is, therefore, not acceptable. Three years of trustworthy employment is not considered to be an acceptable substitute for the background investigation required by Section 4.3(1) and the psychological evaluation of Section 4.3(2) of ANSI 18.17-1973.
13:2	13.5, 13.6 Security Plan	Both the Security Plan and the T&Q Plan revisions change the length of time that security records must be maintained at Ginna. The revised plans now require records to be maintained for three years, which in most cases represents an increase in the retention period. The changes are not, however, in total agreement with the latest rule change relating to records retention published in the May 27, 1988 Federal Register Notice (53 FR 19240).
41	T&Q Plan	

CHANGES NOT CONSIDERED ACCEPTABLE

PageSectionComment

Further, the records retention requirements of neither the previous nor current plans include all categories of records required to be maintained by 10 CFR Part 70. The plans should be further revised to be consistent with regulatory requirements.

Rochester Gas and
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2

cc:

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