



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

February 24, 1982

JOHN E. MAIER
Vice President

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Mr. Ronald C. Haynes, Regional Administrator
U.S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

Subject: NRC Emergency Preparedness Appraisal Team
Notification of Completed Actions for January 15, 1982
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Haynes:

This letter is submitted in accordance with your December 15, 1981 letter relative to the above stated subject which requires in part that your office be informed in writing when each of the aforementioned actions have been completed.

Additionally, this letter will refer to telephone conversions between certain members of my staff and yours regarding updated target dates for certain items in your December 15, 1981 letter.

On January 15, 1982, your Mr. Nemen M. Terc, Appraisal Team Leader, was informed by Mr. Lee Lang and Mr. Bruce Snow via telephone regarding our January 15, 1982 commitments.

The following summarizes the results of that telephone conversation:

Regarding item 3 which states:

"Realign the emergency plan training program to be consistent with the functional area, requirements, and structure of the emergency organization.

This will be accomplished no later than January 15, 1982."

This was completed prior to January 15, 1982.

Regarding item 4 which states:

"Develop and implement means to verify that all individuals with emergency duties have been trained and have attained a minimum level of proficiency. This shall include but not be limited to hands-on training and walk-throughs.

This will be accomplished no later than January 15, 1982."

This item as we understand it, was complete by January 15, 1982.

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TO Ronald C. Haynes

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Regarding item 5, which states:

"Complete the interim installation and testing of equipment in the Technical Support Center to ensure that it will be habitable and functional, and able to perform its intended use during the various accident conditions.

This will be accomplished no later than January 15, 1982."

The Technical Support Center filtration system was completed prior to January 15, 1982.

Regarding item 6, which states:

"Re-evaluate provisions to rapidly and accurately detect and measure radioiodine concentration under field conditions in the presence of noble gases, including equipment and procedures needed to ascertain the location and characteristics of the plume relative to the sampling locations. Provide a written report of the results of your evaluation to the NRC Region I Office and include a schedule for any planned actions.

This will be accomplished no later than January 15, 1982."

This item was completed prior to January 15, 1982.

The following will constitute the above written report.

The equipment we currently use for field radioiodine determination should perform the function of rapidly and accurately monitoring radioiodine under field conditions.

The use of the silver zeolite collection media, the Radeco "medium" volume sampler (1.5 CFM) and the RM-14/HP 190 counting system allows good flexibility and simple operation in the field. The detectable range for this system covers a broad range of iodine concentrations which include the various protective action guide "signal" concentrations. For the predesignated sampling procedure, the detectable range extends from 2×10^{-8} to 3×10^{-5} uCi/cc (12 mRem to 18 Rem adult two hour thyroid dose). The upper range can be extended to 3×10^{-4} uCi/cc (70 Rem adult two hours thyroid dose) by reducing the sample time to one minute. This concentration of radioiodine exceeds the highest PAG signal concentration by nearly a factor of three, so if the concentration was higher for immediate actions, the actual concentration would be meaningless.

NOTE: The iodine dose rates were determined using the EPA 520 manual of Protective Action Guides and Protective Actions for Nuclear Incidents (2/80).

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Regarding item 7, which states:

"Re-evaluate interim facilities, equipment and procedures for post-accident sampling and analysis of the containment atmosphere to determine maximum concentrations that could be handled and analyzed during accident conditions. Provide a written report of the results of your evaluation to the NRC Region I Office and include a schedule for any planned actions.

This will be accomplished no later than January 15, 1982."

This was completed prior to January 15, 1982.

The following constitutes the above mentioned report regarding the results of our evaluation.

The previous system which utilized a glass sample bomb has been replaced with a steel cylinder, solid tubing and quick disconnects. This was done to insure the ability to sample containment if it was pressurized above atmospheric pressure.

The containment samples will be counted on the equipment which will handle the activity present in the sample. The counting equipment normally used for HP and Chem. samples can be used if the sample bomb dose rate is less than 10 mr/hr on contact. Samples above that dose rate can be counted on the extended shelves calibrated for the accident samples. The extended shelves can be used for samples reading up to 600 mr/hr contact for direct counting of the sample. If the particulate filter of the iodine cartridge exceeds 600 mr/hr on contact, a reduced portion of the entire sample can be taken which can be handled and counted. This can be done by taking punchings from the filter and assuming the punching to be representative of the total activity of the filter. The iodine cartridge can be thoroughly mixed and a portion weighed and counted. The counted portion can be assumed to be representative of the entire sample.

The calculated maximum concentration of the isotopes Xe-133, Xe-135 and I-131 assuming counting rates of 1800 counts per second using the extended shelves only are:

X3-133	4600 uCi/sample
XE-135	2500 uCi/sample
I-131	3660 uCi/sample

To further increase our ability to sample and analyze accident samples, a Post Accident Sample System is currently being built, and is scheduled for installation by June 1, 1982.

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Regarding item 8, which states:

"Undertake and complete a review of all emergency plan implementing procedures and make appropriate revisions to:

- a) Clarify required actions, and eliminate existing ambiguities, inconsistencies and errors.
- b) Clarify duties and responsibilities of personnel involved in the various actions.
- c) Provide specific cross-references to other procedures in the action steps as needed to detail and clarify further actions.

The above revision shall be performed in accordance with a schedule as follows:

Procedures SC-1.2A, SC-1.2B, SC-1.3A, SC-1.3B, SC-1.3C, SC-1.3D, SC-1.3E, SC-1.4, SC-1.7B, SC-1.7D, SC-1.7F, SC-1.7H, SC-1.13 to be revised no later than January 15, 1982."

During the January 15, 1982 telephone conversation, my staff stated that not all procedures listed above were complete. The work load required to complete such a total review was underestimated due to subsequent identified procedure interfaces. A new target date for completion of the above listed procedures of February 8, 1982 was agreed upon by my staff and yours.

On February 9, 1982 a second telephone conversation was conducted between your Mr. Crocker and Mr. Snow and Mr. Morrill. During this discussion Mr. Crocker was advised that all mentioned procedures were reviewed and written, but not all had been formally processed through the Plant Operations Review Committee. The delay was caused by the Steam Generator Tube Rupture Event and resultant change in priorities of personnel involved.

A target completion date for PORC review and approval was agreed to by both parties.

We will continue to keep you informed as the remaining items of your December 15, 1981 letter are addressed.

Very truly yours,

John E. Maier
John E. Maier