

APPENDIX A  
NOTICE OF VIOLATION

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

Docket No. 50-244  
License No. DPR-18

As a result of the inspection conducted on April 23-27, 1984, and in accordance with the revised NRC Enforcement Policy (10 CFR 2, Appendix C) published in the Federal Register on March 8, 1984 (FR9987), the following violation was identified:

10 CFR 50.54(q) requires that nuclear power reactors have and follow plans that meet the standards in 10 CFR 50.47(b) and the requirements of Appendix E to 10 CFR 50. 10 CFR 50.47(b)(15) requires that radiological emergency response training is provided to those who may be called to assist in an emergency and periodic retraining programs be provided to emergency personnel.

Section 7.1 of the Emergency Plan states in part "Training classes on the Radiation Emergency Plan shall be conducted annually for all station personnel who may actively participate in the Radiation Emergency Plan". Procedure No. SC-600, Emergency Plan Qualification and Notification provides a list of members of the Emergency Response Organization.

Contrary to the above three members of the Emergency Response Organization had not attended training classes on the Radiation Emergency Plan since December 1982.

This is a Severity Level IV violation (Supplement I).

Pursuant to the provisions of 10 CFR 2.201, Rochester Gas and Electric Corporation is hereby required to submit to this office within thirty days of the date of the letter which transmitted this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending this response time.

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## APPENDIX B

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

Docket No. 50-244  
License No. DPR-18

As a result of the inspection conducted April 23-27, 1984 the following areas related to the emergency preparedness program should be considered for improvement.

1. (Open 50-244-84-08-02) Revise emergency plan implementing procedures SC-201, Unusual Event, SC-202, Alert, SC-203, Site Emergency, SC-204, General Emergency to show notifications to government agencies are provided within 15 minutes of the declaration of the emergency.
2. (Open 50-244-84-08-03) Revise emergency plan implementing procedure SC-600, Emergency Plan Qualification and Notification, to provide for removal of individuals from the call out list who have not participated in training during the previous 12 months (present procedure specifies 18 months).
3. (Open 50-244-84-08-04) Determine by survey, review of literature and discussion with a qualified meteorologist, if necessary, that the microwave antenna and shelter do not adversely impact meteorological measurements. Provide written documentation to the Region I NRC office.
4. (Open 50-244-84-08-05) Amend the Ginna technical specifications to include "Meteorological Monitoring" which is a safety related program. The standard limiting conditions for operation and surveillance requirements for this program are shown in NUREG-9452, "Standard Technical Specifications for Westinghouse Pressurized Water Reactors".
5. (Open 50-244-84-08-06) Provide a complete description of the Meteorological Monitoring Program as requested in the Standard Review Plan Section 2.3.3, include this in the next FSAR revision (Dec 84).
6. (Open 50-244-84-08-07) Modify procedure SC-420 "Estimating Off-Site Doses" as follows:
  - (a) Include centerline X/Q values in Table I for the limiting site boundary distance(s);
  - (b) Obtain meteorological measurements from the plant computer and use "actual 15 minute average delta-temperature values (not derived);" and

- (c) Computerize this dose assessment method to insure precise dose calculations and timely protective action recommendations
7. (Open 50-244-84-08-08) Include a procedure for implementing the currently available, refined dose model and describe the technical bases and justification used for selection of this MIDAS dose assessment model. Please address the following areas:
- (a) how are mesoscale transport and diffusion of effluents from ground level and/or elevated releases modelled and what meteorological data is available for use with midas in the vicinity (up to 10 miles) of the plant;
  - (b) how is the physical height of the mixing layer or turbulent internal boundary layer (TIBL) determined and on what parameters is it based (onsite measurements, model statistics and/or climatology from local research projects). How accurate is this going to be?
  - (c) Are diffusion rates based on the most appropriate stability indicator(s) and
  - (d) are building wake influences factored into the model?