



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

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July 20, 1984

Mr. Thomas T. Martin, Director
Division of Engineering and Technical Programs
U. S. NUCLEAR REGULATORY COMMISSION, Region I
631 Park Avenue
King of Prussia, Pa. 19406

Subject: Inspection 50-244/84-08

Dear Sir:

In response to the referenced inspection report, the following actions have been completed or will be taken by the dates given.

Item 84-08-01: 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 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.

Response: The procedure SC-600 was reviewed and revised to require individuals be retrained in their emergency response function annually or be removed from the qualification list. The revision reduced the time frame for qualification and removed several individuals from the procedure. This procedure change was approved by PORC on July 18, 1984 and training was accelerated where appropriate.

To avoid recurrence of this problem, the training records for individuals performing emergency response functions will be reviewed monthly. The classroom training records are computerized and by use of selective sorting, individuals can be identified before their training expires. Thus, the procedure can be kept current by adding or deleting names. COMPLIANCE IS COMPLETE.

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The following items, Appendix B, have been considered for improvement.

Item 50-244-84-08-02: Revise emergency plan implementing procedures SC-201, "Unusual Event", SC-202, "Alert", SC-203, "Site Emergency", and SC-204, "General Emergency" to show notifications to government agencies are provided within 15 minutes of the declaration of the emergency.

Response: These procedures have been changed as suggested. The procedures were approved on May 22, 1984 and are currently in use. THIS ITEM IS COMPLETE.

Item 50-244-08-03: 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).

Response: This procedure was revised per PCN 84-1084 to remove any individuals from the call out list who have not participated in training during the previous 12 months. (See response to Item 84-08-01). This PCN was reviewed by PORC on July 18, 1984 and approved for use. THIS ITEM IS COMPLETE.

Item 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.

Response: Rochester Gas and Electric Corporation will select a contractor to carry out the necessary surveys and reviews and will develop a schedule for completion of the study by August 31, 1984.

Item 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".

Response: The meteorological monitoring program was originally reviewed as part of SEP Topic II-2.B, "Onsite Meteorological Measurements Program", NRC Safety Evaluation Report dated May 29, 1979. In the conclusion of that report, no mention was made of the need for Technical Specifications for this equipment. Subsequently, the issue of meteorological monitoring was transferred to the 10 CFR 50 Appendix I review effort. This effort resulted

in the "Radiological Effluent Technical Specifications, (RETS)" incorporated into the Ginna Technical Specifications by Amendment No. 57. The NRC's Safety Evaluation Report, dated September 28, 1983, and the attached Franklin Technical Evaluation Report TER-C5506-93, conclude that the Ginna provisions for RETS, as implemented by Amendment No. 57, including the meteorological monitoring program, meets the requirements of 10 CFR 50, Appendix I and NUREG-0472, Rev. 2, February 1, 1980. This extensive review did not result in the conclusion that the meteorological monitoring instrumentation was required to be incorporated into the Ginna Technical Specifications. We agree with such a conclusion and do not propose any further action in this regard.

Item 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 (December 1984).

Response: In accordance with the requirements of 10 CFR 50.71, information regarding the Meteorological Monitoring Program described in the current FSAR will be modified as necessary to ensure that the information is accurate, or that currently-accurate information is properly referenced.

RG&E's present schedule for submittal of the updated FSAR is December 1984.

Item 50-244-84-08-07: Modify procedure SC-420 "Estimating Offsite 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)".
- (c) Computerize this dose assessment method to insure precise dose calculations and timely protection action recommendations.

Response:

- (a) A procedure change PCN 84-1087 was submitted to incorporate this suggestion. This change will be reviewed and presented for approval by PORC by August 31, 1984.
- (b) The procedure change PCN 84-1087 also incorporated the use of weather data as obtained from the meteorological mini-computer. This provides "actual 15 minute average delta-temperature values." The revised procedure will be presented for approval by August 31, 1984.

- (c) Computerization of this dose assessment method is being programmed for an IBM Personal Computer for use at the EOF. This should be completed by August 31, 1984.

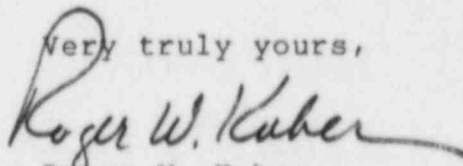
Item 50-244-84-08-08: Include a procedure for implementing the currently available, refined dose model and describe the technical basis and justification used for selection of this MIDAS dose assessment model. Please address the following areas:

- (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 building wake influences factored into the model?

Response:

- (a) & (b) Rochester Gas and Electric Corporation in conjunction with a contractor will develop a schedule for addressing the areas of concern by August 31, 1984. It is our understanding that requirements for dose modeling and weather data use will be clarified at a workshop to be scheduled for Region I licensees.
- (c) Building wake influences are currently factored into the MIDAS model.

Very truly yours,



Roger W. Kober
Vice President
Electric and Steam Production

50-244-84-08-08
MIDAS