

March 14, 1983

Docket No. 50-244
LS05-83-03-030

Mr. John E. Maier, Vice President
Electric and Steam Production
Rochester Gas and Electric Corporation
89 East Avenue
Rochester, New York 14649

Dear Mr. Maier:

SUBJECT: ORDER CONFIRMING LICENSEE COMMITMENTS ON POST-TMI RELATED ISSUES
(GENERIC LETTERS 82-05 AND 82-10)

R. E. Ginna Nuclear Power Plant

The Commission has issued the enclosed Order confirming your commitments to implement those post-TMI related items set forth in NUREG-0737 for which the staff requested completion on or after July 1, 1981. This Order is based on commitments contained in your letters responding to the NRC's Generic Letters 82-05 and 82-10 dated March 17, 1982 and May 5, 1982, respectively.

The Order references your letters and, in its Attachments, contains lists of the applicable NUREG-0737 items with your schedular commitments. As discussed in the Order, several of the items listed in Generic Letter 82-10 will be handled outside of this Order.

The Commission's intention when it issued NUREG-0737 was that items would be completed in accordance with the staff's recommended schedule. However, our evaluation of your proposed schedule exceptions concludes that the proposed delays are acceptable. Among other things, the Order requires implementation of these items in accordance with your proposed schedule.

Some of the items set forth in the Attachments to the Order are subject to post implementation review and inspection. Our post implementation review and/or the development of Technical Specifications may identify alterations to your method of implementing and maintaining the requirements. Any identified alterations will be the subject of future correspondence.

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USGPO: 1981-335-960

Mr. John E. Maier

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March 14, 1983

A copy of this Order is being filed with the Office of the Federal Register for publication.

Sincerely,

Original signed by/

Dennis M. Crutchfield, Chief
Operating Reactors Branch #5
Division of Licensing

Enclosure:
Order

cc w/enclosure:
See next page

OFFICE	DL:ORB#5	DL:ORB#5	DL:ORAB	OELD	DL:ORB#5	DL:ORAB	DL:ORAB
SURNAME	HSmith:ajs	G. Wick	Alexion	Crutchfield	Crutchfield	Crutchfield	Eisenhut
DATE	03/14/83	03/07/83	03/7/83	03/7/83	03/7/83	03/7/83	03/14/83

March 14, 1983

cc

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Ezra Bialik
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Washington, D. C. 20555

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Washington, D. C. 20555

U. S. Environmental Protection Agency
Region II Office
ATTN: Regional Radiation Representative
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New York, New York 10007

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Ronald C. Haynes, Regional Administrator
Nuclear Regulatory Commission, Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)	
)	
ROCHESTER GAS AND ELECTRIC)	Docket No. 50-244
CORPORATION)	
)	
(R. E. Ginna Nuclear Power Plant))	

ORDER CONFIRMING LICENSEE COMMITMENTS
ON POST-TMI RELATED ISSUES

I.

Rochester Gas and Electric Corporation (the licensee) is the holder of Provisional Operating License No. DPR-18 which authorizes the operation of the R. E. Ginna Nuclear Power Plant (the facility) at steady-state power level not in excess of 1520 megawatts thermal. The facility is a pressurized water reactor (PWR) located at the licensee's site in Wayne County, New York.

II.

Following the accident at Three Mile Island Unit No. 2 (TMI-2) on March 28, 1979, the Nuclear Regulatory Commission (NRC) staff developed a number of proposed requirements to be implemented on operating reactors and on plants under construction. These requirements include Operational Safety, Siting and Design, and Emergency Preparedness and are intended to provide substantial additional protection in the operation of nuclear facilities based on the experience from the accident at TMI-2 and the official studies and investigations of the accident. The staff's proposed requirements and

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schedule for implementation are set forth in NUREG-0737, "Clarification of TMI Action Plan Requirements." Among these requirements are a number of items, consisting of hardware modifications, administrative procedure implementation and specific information to be submitted by the licensee, scheduled to be completed on or after July 1, 1981. On March 17, 1982, a letter (Generic Letter 82-05) was sent to all licensees of operating power reactors for those items that were scheduled to be implemented from July 1, 1981 through March 1, 1982. Subsequently, on May 5, 1982, a letter (Generic Letter 82-10) was also sent to all licensees of operating power reactors for those items that were scheduled for implementation after March 1, 1982. These letters are hereby incorporated by reference. In these letters each licensee was requested to furnish within 30 days pursuant to 10 CFR 50.54(f) the following information for items which the staff had proposed for completion on or after July 1, 1981:

(1) For applicable items that have been completed, confirmation of completion and the date of completion, (2) For items that have not been completed, a specific schedule for implementation, which the licensee committed to meet, and (3) Justification for delay, demonstration of need for the proposed schedule, and a description of the interim compensatory measures being taken.

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III.

Rochester Gas and Electric Corporation responded to the Generic Letter 82-05 by letters dated April 23, 1982, June 17, 1982, September 16, 1982 and December 2, 1982 and March 3, 1983. Rochester Gas and Electric Corporation responded to the Generic Letter 82-10 by letters dated June 11, 1982 and December 2, 1982 and March 7, 1983. In these submittals, Rochester Gas and Electric Corporation confirmed that most of the items identified in the Generic Letters had been completed and made firm commitments to complete the remainder. The attached Tables summarizing the licensee's schedular commitments or status were developed by the staff from the Generic Letters and the licensee-provided information.

There are several items in Generic Letter 82-10 that, as noted in Attachment 2, have licensee schedules which are yet to be determined. These items are, therefore, not included in this Order. The licensee considers some of the items addressed in this Order to be completed or to require no modifications. These items are so noted in Attachments 1 and 2. The staff's evaluation of the licensee's delays for implementation of the remaining items is provided herein.

II.B.2 Plant Shielding

This item will be completed in May 1983 and will be operational in July, 1983. The delay was caused by equipment delivery problems and the fact that the design was more complex, requiring a greater number of cables to be routed than originally expected. The licensee has stated that the

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the experience at TMI has shown that existing radwaste equipment will probably not be used for long term recovery and cleanup following accidents with similar fuel damage. Existing radwaste equipment may be used following less significant accidents. In such cases the dose rates at the existing equipment will be reduced from the conservatively high doses calculated in their study. Because of the difficulty defining when the radwaste equipment may be used, the licensee has committed to relocate the radwaste control panel. This relocation may be prudent for some long term recovery actions to minimize radiation exposure.

II.B.3 Post-Accident Sampling

This item will be delayed by the licensee and will be completed three (3) weeks after achieving criticality following the Spring 1983 refueling outage or by June 30, 1983, whichever is later. Originally the licensee had proposed to provide additional shielding to the existing sampling system. That proposal was found to be impractical and the licensee then began formulating plans for a post-accident sampling system. The system was to have been installed by July 1, 1982, but due to the work load during the outage following the steam generator tube rupture (January 25, 1982) the completion date slipped to September 1, 1982. Subsequent to the outage, contractor- employed labor personnel involved in the installation of the system initiated a strike. The strike began on June 2, 1982, and ended July 21, 1982. Installation was resumed but additional delays developed when a valve in the discharge line of the post-accident sampling system failed. The valve

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is inside containment and cannot be replaced before the March 1983 shutdown. The utility has committed to have the post-accident sampling system installed and operational in three (3) weeks after achieving criticality following the Spring 1983 refueling outage or by June 30, 1983, whichever is later. In the interim, post-accident sampling can be accomplished through the use of revised procedures, upgraded sample shields and transport equipment, and the addition of recently installed permanent shielding.

IID.1.2 Relief Valve and Safety Valve Test Programs

The licensee plans to issue its final report on the relief valve and safety valve test program in March 1983. The necessary pipe support modifications identified in the analyses will be completed during the refueling outage scheduled for the Spring of 1983. A preliminary evaluation shows that the valves tested represent the Ginna safety and relief valve designs and that the conditions tested envelope the range of expected operating and accident conditions for the Ginna plant.

III.D.3.4 Control Room Habitability

The licensee has completed the evaluations of the Ginna control room HVAC system that are part of Item III.D.3.4, and has identified certain plant modifications. The modifications were reviewed by the staff and were found to be acceptable provided the licensee addressed the single failure criterion of the intake and exhaust ductwork. RG&E has committed in a letter dated March 7, 1983, to install redundant dampers

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on the intake and exhaust ductwork which have direct access to the atmosphere to ensure that the single failure criterion is met. Due to the extensive design modifications that have been proposed, the completion of all of the modifications will be accomplished by July, 1984.

We find, based on the above evaluation, that: 1) the licensee has taken corrective actions regarding the delays and has made a responsible effort to implement NUREG-0737 requirements noted; 2) there is good cause for the several delays (unexpected design complexity, contractor labor problems, and equipment delays); and 3) as noted above, interim compensatory measures have been provided.

In view of the foregoing, I have determined that these modifications and actions are required in the interest of public health and safety and, therefore, the licensee's commitments should be confirmed by Order.

IV.

Accordingly, pursuant to Sections 103, 161i, and 161o of the Atomic Energy Act of 1954, as amended, and the Commission's regulations in 10 CFR Parts 2 and 50, IT IS HEREBY ORDERED EFFECTIVE IMMEDIATELY THAT THE LICENSEE SHALL:

Implement and maintain the specific items described in the Attachments to this Order in the manner described in the licensee's submittals noted in Section III herein no later than the dates in the Attachments.

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V.

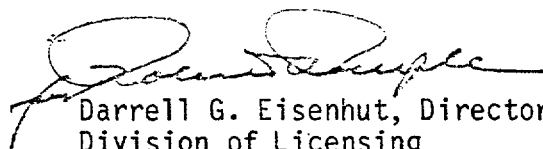
The licensee may request a hearing on this Order within 20 days of the date of publication of this Order in the Federal Register. A request for a hearing shall be addressed to the Director, Office of Nuclear Reactor Regulation, U. S. Nuclear Regulatory Commission, Washington, D. C. 20555. A copy shall also be sent to the Executive Legal Director at the same address. A REQUEST FOR A HEARING SHALL NOT STAY THE IMMEDIATE EFFECTIVENESS OF THIS ORDER.

If a hearing is requested by the licensee, the Commission will issue an Order designating the time and place of any such hearing.

If a hearing is held concerning this Order, the issue to be considered at the hearing shall be whether the licensee should comply with the requirements set forth in Section IV of this Order.

This Order is effective upon issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation

Dated at Bethesda, Maryland,
this 14 day of March,
1983.

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Attachments:

1. Licensee's Commitments on Applicable
NUREG-0737 Requirements from Generic
Letter 82-05
2. Licensee's Commitments on Applicable
NUREG-0737 Requirements from Generic
Letter 82-10

LICENSEE'S COMMITMENTS ON APPLICABLE NUREG-0737 ITEMS FROM GENERIC LETTER 82-05

Item	Title	NUREG-0737 Schedule	Requirement	Licensee's Completion Schedule (or status)*
I.A.3.1	Simulator Exams	10/01/81	Include simulator exams in licensing examinations	Complete
II.B.2	Plant Shielding	01/01/82	Modify facility to provide access to vital areas under accident conditions	07/83
II.B.3	Post-Accident Sampling	01/01/82	Install upgrade post-accident sampling capability	3 weeks after achieving criticality following Spring 1983 refueling outage or June 30, 1983, whichever is later
II.B.4	Training for Mitigating Core Damage	10/01/81	Complete training program	Complete
II.E.1.2	Aux. Feedwater Initiation & Flow Indication	07/01/81	Modify instrumentation to level of safety grade	Complete
II.E.4.2	Containment Isolation Dependability	07/01/81	Part 5-lower containment pressure setpoint to level compatible w/normal operation.	Complete
		07/01/81	Part 7-isolate purge & vent valves on radiation signal	Complete
II.F.1	Accident Monitoring	01/01/82	(1) Install noble gas effluent monitors.	Complete
		01/01/82	(2) Provide capability for effluent monitoring of iodine	Complete
		01/01/82	(3) Install incontainment radiation-level monitors	Complete
		01/01/82	(4) Provide continuous indication of containment pressure	Complete
		01/01/82	(5) Provide continuous indication of containment water level.	Complete
		01/01/82	(6) Provide continuous indication of hydrogen concentration in containment.	Complete

*Where completion date refers to a refueling outage (the estimated date when the outage begins), the item will be completed prior to the restart of the facility

GINNA PLANT

LICENSEE'S COMMITMENTS ON APPLICABLE NUREG-0737 ITEMS FROM GENERIC LETTER 82-10

Item	Title	NUREG-0737 Schedule	Requirement	Licensee's Completion Schedule (or status)*
I.A.1.3.1	Limit Overtime	10/01/82 per Gen Ltr 82-12 dtd. 6/15/82	Revise administrative procedures to limit overtime in accordance w/NRC Policy Statement issued by Generic Ltr. No. 82-12, dtd 6/15/82	Complete
I.A.1.3.2	** Minimum Shift Crew	To be superseded by Proposed Rule	To be addressed in the Final Rule on Licensed Operator Staffing at Nuclear Power Units	To be addressed when Final Rule is issued.
I.C.1	** Revise Emergency Procedures	Superseded by SECY 82-111	Reference SECY 82-111, Requirements for Emergency Response Capability	To be determined
II.D.1.2	RV and SV Test Programs	07/01/82	Submit plant specific reports on relief valve and safety valve program.	03/83
II.D.1.3	Block Valve Test Program	07/01/82	Submit report of results of test program	Complete
II.K.3.30 & 31	** SBLOCA Analysis	1 year after staff approval of model	Submit plant specific analyses	To be determined following staff approval of model
III.A.1.2	** Staffing Levels for Emergency Situations	Superseded by 82-111	Reference SECY 82-111, Requirements for Emergency Response Capability	To be Determined
III.A.1.2	** Upgrade Emergency Support Facilities	" " " " " " " "	" " " "	" " "
III.A.2.2	** Meteorological Data	" " " " " " " "	" " " "	" " "
III.D.3.4	Control Room Habitability	To be determined by licensee	Modify facility as identified by licensee study.	07/84

*Where completion date refers to a refueling outage (the estimated date when the outage begins), the item will be completed prior to the restart of the facility.

**Not Part of Confirmatory Order.