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ROBERT C. MECREDY
Vice President
Nuclear Operations

March 18, 2002

Mr. Samuel J. Collins
Director, Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

SUBJECT: Request for Extension of Time to Submit a Request for Hearing
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

- REFERENCES: (1) Letter from Samuel J. Collins, NRC, to Paul C. Wilkens, RG&E,
Subject: *Issuance of Order for Interim Safeguards and Security
Compensatory Measures for R.E. Ginna Nuclear Power Plant*,
dated February 25, 2002.
- (2) Letter from Robert C. Mecredy, RG&E, to Samuel J. Collins,
NRC, Subject: *Twenty Day Response to Interim Safeguards and
Security Compensatory Measures Order*, dated March 18, 2002.

Dear Mr. Collins:

Section IV of the NRC's February 25, 2002, Order (Ref. (1)) Modifying License ("Order") states that, in accordance with 10 CFR 2.202, a Licensee must submit an answer to the Order and may request a hearing on the Order within 20 days of the date of the Order. In addition, the Order states "[w]here good cause is shown, consideration will be given to extending the time to request a hearing." For the following reasons, Rochester Gas and Electric Corporation ("RG&E") hereby requests an extension of time to request a hearing.

By separate letter dated March 18, 2002 (Ref. 2), RG&E is submitting its response and answer to the Order. As required by Condition C.1 of the Order, RG&E's response identifies specific actions to be taken to comply with each applicable requirement and provides a schedule for implementation. We have responded to Conditions B.1 and B.2 by identifying, where appropriate, requirements for which: (1) RG&E is unable to comply; (2) compliance is unnecessary in RG&E's specific circumstances; (3) compliance would cause RG&E to be in violation of a Commission regulation or the facility license; or (4) implementation would adversely impact safe operation of the facility.

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In a few instances, as detailed in RG&E's response to the Order, we are unable to complete the necessary evaluations to determine what actions are appropriate and what an appropriate schedule for implementation would be within the required response time. For these requirements, specifically Interim Compensatory Measures B.2.a(1), B.2.a(2), and B.2.b., RG&E's response describes the steps we are taking and a schedule for completing the necessary evaluations and supplementing our response as necessary. Because we are unable to ascertain what actions would be appropriate in the context of meeting the NRC's intent for these measures, we will be unable to determine whether it is necessary to request a hearing until completion of the necessary evaluations.

Because of the unique nature of the situation that precipitated issuance of the Order, and in order to preserve our hearing rights, pursuant to Section IV of the Order, RG&E requests an extension of time to file a request for hearing with respect to Interim Compensatory Measures B.2.a(1), B.2.a(2), and B.2.b until the dates identified in our March 18, 2002 submittal for completing the analyses and informing the NRC of the specific actions to be taken to implement those measures.

Very truly yours,

A handwritten signature in black ink, appearing to read "Robert C. Mecredy". The signature is fluid and cursive, with the first name "Robert" and last name "Mecredy" clearly visible.

Robert C. Mecredy

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