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SUBJECT: Responds to Generic Ltr 88-20, Suppl 1, "Initiation of Individual Plant Exam for Severe Accident Vulnerabilities."

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October 27, 1989

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U.S. Nuclear Regulatory Commission
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Attn: Allen R. Johnson
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Washington, DC 20555

Subject: Generic Letter 88-20, Supplement No. 1, "Initiation Of The Individual Plant Examination For Severe Accident Vulnerabilities - 10 CFR §50.54(f)"
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Johnson:

Rochester Gas & Electric Corporation (RG&E) is undertaking a focused Level 2 probabilistic risk assessment (PRA) for the R. E. Ginna Nuclear Power Plant. This PRA will meet the intent of Generic Letter 88-20, "Individual Plant Examination For Severe Accident Vulnerabilities - 10 CFR §50.54(f)," dated November 23, 1988; Generic Letter 88-20, Supplement No. 1, "Initiation Of The Individual Plant Examination For Severe Accident Vulnerabilities - 10 CFR §50.54(f)," dated August 29, 1989; and NUREG-1335, "Individual Plant Examination: Submittal Guidance," dated August, 1989.

RG&E has taken the following steps to date to lay the groundwork for the Ginna PRA:

- (1) Two engineers with extensive nuclear PRA experience have been hired as permanent, full-time RG&E employees;
- (2) RG&E personnel have participated in industry-wide workshops, including the NRC-sponsored IPE workshop in Fort Worth, Texas; the EPRI IPE workshop in Saint Louis, Missouri; and the EPRI Engineering Systems Analysis Forum in Boston, Massachusetts;
- (3) RG&E personnel are actively participating in NUMARC severe accident/IPE/PRA activities, and are currently serving on NUMARC's Ad Hoc Advisory Committee on Other External Events;
- (4) Discussions were held with engineering consulting organizations to support the Ginna PRA program. A detailed request for proposals (RFP) was sent to six potential bidders. Bids are currently being evaluated by the RG&E PRA staff;
- (5) RG&E has collected information on Ginna's operating history, and has categorized reactor trip information to facilitate the selection and quantification of Ginna-specific initiating events; and,
- (6) RG&E is currently collecting and evaluating Ginna plant-specific component failure and demand data from January 1, 1980, to December 31, 1988.

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RG&E intends to begin the Ginna PRA on or before January 1, 1990. The Ginna PRA will be a full Level 1 and focused Level 2 PRA (a Level 2 PRA without plant-specific source term calculations), and will address all appropriate internal initiating events.

The Ginna PRA will not address external initiating events other than internal plant flooding at this time. RG&E participated in the Systematic Evaluation Program (SEP), which evaluated the impact of most external events at Ginna; we anticipate making extensive use of SEP analyses and results to meet any future NRC requirements for an Individual Plant Examination for External Events (IPE-EE).

The Ginna PRA will utilize the so-called large linked fault tree / small event tree approach described in NUREG/CR-2300, Generic Letter 88-20, and NUREG-1335. Exact schedules and milestones for the Ginna PRA will not be established until RG&E selects an engineering support consultant. We have established a goal of completing the Ginna PRA within an 18 to 24 month time frame. This translates into draft results being available to RG&E on or before January 1, 1992. RG&E anticipates submitting the final results to the NRC on or before September 1, 1992.

RG&E has established several major goals for the Ginna PRA, including:

- (1) Obtaining a tool that will help achieve corporate goals related to the continuation of safe, reliable, and efficient operation of Ginna;
- (2) Giving RG&E the ability to evaluate changes in component and system design, operating and maintenance procedures, NRC licensing requirements, component and system availability, human reliability, Technical Specifications, safety margins identified by deterministic analyses, and new information on accident progression, containment response, and source terms; and,
- (3) Establishing models that will allow the qualitative and quantitative evaluation of failure probabilities, plant damage states, and release categories through identification of significant risk contributors.

RG&E has designed a preliminary format for the Ginna PRA to optimize the presentation of inputs, data, models and results to meet our goals. This format does not completely follow the NRC-suggested format shown in NUREG-1335, Table 2.1. RG&E will provide the NRC staff, as part of its submittal of the Ginna PRA results, a cross-reference table to assist in comparing the two formats.

Very truly yours,



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