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SUBJECT: Responds to generic SER on resolution of USI A-46.

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October 7, 1988

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U.S. Nuclear Regulatory Commission
Document Control Desk
Attn: Mr. Carl Stahle
PWR Project Directorate No. 1
Washington, D.C. 20555

Subject: Response to Generic SER on Resolution of Unresolved
Safety Issue A-46
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

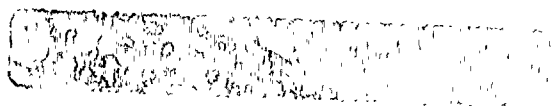
Dear Mr. Stahle:

On July 29, 1988, the NRC Staff issued a Safety Evaluation Report (SER) on Revision 0 of the Generic Implementation Procedure (GIP) developed by the Seismic Qualification Utility Group (SQUG). The letter to SQUG enclosing the SER requests that SQUG member utilities provide to the NRC, within 60 days, a schedule for implementing the GIP. By letter to Mr. Shao, dated August 19, 1988, SQUG clarified that the 60 days would expire on October 7, 1988. This letter responds to that request.

According to the generic schedule submitted by SQUG in its October 9, 1987 letter, the GIP was to be completed by the end of calendar 1988, followed by NRC review in the first quarter of 1989. However, as the SER acknowledges, the GIP is not yet complete. Several technical areas have not yet been fully included in the GIP. Moreover, the SER does not resolve certain licensing issues central to the completion of the GIP raised in Part 1 of Revision 0. Given this delay in SER issuance, this objective is considered not achievable.

The schedule for completion of the GIP has been established to be in the first quarter of 1989. This schedule is dependent upon: (1) satisfactory and timely resolution of all outstanding issues, (2) accomplishment of all interim milestones as set forth in the schedule and (3) continued agreement between SQUG and NRC on major technical and licensing issues.

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RG&E will not be in a position to establish the scope of its A-46 commitment until the GIP is completed and all licensing issues resolved. Given the magnitude of the effort required to achieve resolution of A-46, final implementation must be carefully integrated into outage schedules. Assuming no significant changes in the workscope currently envisioned for resolution, the plant walkdown associated with the resolution of this issue can be undertaken by the conclusion of the second refueling outage after the final SER is issued and open items resolved. Identification of safe shutdown equipment and other tasks necessary to prepare for the walkdown will be accomplished prior to that outage. If the GIP is completed during the first quarter of 1989, and a final SER with no open items or significant change in workscope is issued in the second quarter of 1989, this outage would commence for R.E. Ginna on or about March 1, 1991. If the schedule for GIP development and NRC review slips further, the walkdown and other activities would have to be delayed.

RG&E will review the final GIP after approval by the NRC and resolution of all outstanding issues. Based on this review, RG&E will either commit to pursue a generic resolution of USI A-46 or file a plant-specific response. Should the generic resolution be pursued, RG&E may, at its option, elect to modify certain aspects of the generic program based upon suitable justification.

Very truly yours,



Robert C. Mcreedy
General Manager
Nuclear Production

xc: U.S. Nuclear Regulatory Commission
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Ginna Senior Resident Inspector

