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

40-4 OCT 26 5-26-2700

October 26, 1988

Mr. William T. Russell
Regional Administrator
US Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

Subject: Inspection Report 50-244/88-14
Notice of Violation
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Russell:

In accordance with NRC Inspection Report 88-14 which stated:
"Title 10, Code of Federal Regulations, Part 50.54(t) requires
licenses who are authorized to operate a nuclear power facility
to provide for review of its emergency preparedness program at
least every 12 months. This review shall include an evaluation
of the interface with State and local governments. In addition
the results of this determination shall be made available to the
State and local governments.

Contrary to the above: Rochester Gas and Electric failed to
evaluate the adequacy of the interface with the State of New York
and Monroe and Wayne Counties for four of the previous seven
years and failed to make available the results of the evaluation
to the state/local governments for six of the seven years."

The following response is provided:

(1) Reason for the violation

50-244/88-14-3



Rochester Gas and Electric agrees with the stated violation.

The primary reason for not formally notifying state and county agencies prior to 1988 was lack of providing explicit instructions in the governing QA procedure for performing the annual evaluation.

Formal notification of availability commenced this year following the 1988 annual evaluation with the mailing of the evaluation results.

With regard to the annual evaluation of the interfaces, our recent review of the evaluation reports and checklists for the past seven years indicates this evaluation was performed and documented annually commencing in 1983. 1982 was the only year of the seven for which the interfaces were not addressed.

(2) Corrective steps taken and the results achieved

Remedial steps taken are described in paragraph 4.1 of this NRC Inspection Report 88-14. The reports to the governmental agencies resulted in no further action from RG&E or the governmental agencies.

(3) Corrective steps which will be taken to avoid further violations.

The audit check list utilized to perform the annual reviews will be undergoing review and revision. The revision will, as a minimum, incorporate the guidelines utilized in July to conduct the supplemental audit of the governmental interfaces. Other appropriate checklist changes will be made following a comparison to the INPO Good Practice EP 801 "Generic Guidelines For Emergency Preparedness Review".

Governing procedure QA-1808 Revision 2, "Auditing of the Nuclear Emergency Response Plan", will also be revised to include the need to make available the results of each annual evaluation to the state and local governments.



(4) The date when full compliance will be achieved is prior to the 1989 annual review/audit of the emergency preparedness program currently scheduled for June of 1989.

Very truly yours,

Robert C. McCreedy
Robert C. McCreedy
General Manager
Nuclear Production

xc: U.S. Nuclear Regulatory Commission (original)
Document Control Desk
Washington, DC 20555

Ginna NRC Senior Resident Inspector



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 RUSSELL,W.T. Region 1, Ofc of the Director

SUBJECT: Responds to violations noted in Insp Rept 50-244/88-14.
 Corrective actions:audit check list will be revised.

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