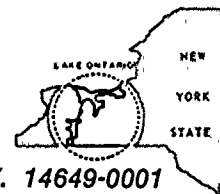




ROCHESTER GAS AND ELECTRIC CORPORATION • 89 EAST AVENUE, ROCHESTER, N.Y. 14649-0001



ROGER W. KOBER
VICE PRESIDENT
ELECTRIC & STEAM PRODUCTION

TELEPHONE
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November 19, 1986

Dr. Thomas E. Murley, Regional Administrator
U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

Subject: Inspection Report No. 50-244/86-12
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Dr. Murley:

Inspection Report 50-244/86-12 was sent to RG&E with a letter from Mr. Thomas T. Martin. The inspection report concerned an inspection conducted August 26-29, 1986, to review Emergency Planning. A response was requested within 30 days to address a concern noted in the letter even though no violations were issued. The concern is addressed as follows:

As stated in the Inspection Report; "The licensee's program was examined to determine its adequacy in regard to the staffing of key emergency positions (depth of personnel) and the timeliness of augmentation of emergency response personnel..."

"A review of key positions in the TSC and EOF revealed that there were at least two people assigned to each position. However, many people were assigned to more than one position. ... A review of the call-in procedures indicate that off-shift personnel are notified by telephone call-outs. There is no specified duty roster or team assignments and staffing is accomplished by calling individuals until someone is reached for each position. Several key positions have call-out lists that are very large and could result in unacceptable response delays for certain positions. A review of the results of the Off-hours Telephone Alert Test conducted on August 9, 1986 indicated that the licensee was unable to contact most members of TSC staff and unable to contact several key members of the EOF staff.

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Based on this performance, we are concerned as to the licensee's ability to staff the emergency response organization in a timely manner. Since this item was self-identified, and short-term corrective action has been taken, it was not cited as a violation (50-244/86-12-01)."

Following investigation of the concern related to telephone alert tests, it was determined that the procedure for implementing such call-in tests was deficient in that it (1) placed too much burden on key personnel who had to make several calls and (2) did not contain specific instructions indicating the need to continue the notification process to confirm filling key positions at Plant and Corporate Emergency Response Facilities (ERF's).

An additional concern was that there was no demonstration of depth of qualified individuals to fill key positions in the Emergency Response Organization. A comprehensive review of available personnel qualified to fill these positions was conducted. As a result, lists for each key position have been increased to provide greater depth.

Corrective actions have been implemented to alleviate these deficiencies by making more qualified people available to fill the ERF positions and by revising the notification procedures. The phone calls necessary to fill key positions have been redistributed to persons not required to report to ERF's under immediate notification conditions. This distribution will free up the Recovery Manager to begin his analysis of conditions in preparation for activating the Emergency Operations Facility (EOF). Attachment I illustrates how notification of key positions is currently made. In addition, procedures have been revised to include more detailed instruction for callers to assure that key positions are filled. A pager system is available to aid in the notification process.

A training matrix is being developed to enhance qualification of the personnel listed to fill each EOF key position. The training will include class instruction, participation in table top drills, read-and-acknowledge transmittals and participation in drills or exercises.

For the longer term, a Task Force has been established with an objective to optimize the Emergency Plan notification process. The current revised procedures will assure an adequate response but potential improvements will be examined. Options which will be reviewed include revised call lists to further reduce the number of calls one individual must make to minimize the total notification times and the investigation of automatic dialing systems.

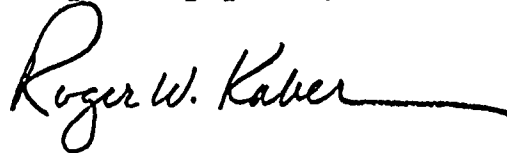


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The inspection report also requested that a schedule be provided to establish when the corrective actions will be complete. Short term actions have been completed by virtue of the revised lists of qualified personnel and revised procedures. Long term actions to enhance our response capability and to ensure a continued high level of performance will be completed before the next annual exercise. A full training cycle which documents the qualification of all emergency response personnel will have been completed by that time. The task force review of notification method options is expected to be completed by April 1, 1987 and testing of those options will be completed by June 1, 1987. The implementation schedule of any enhancement options will be dependent upon the options chosen.

Very truly yours,

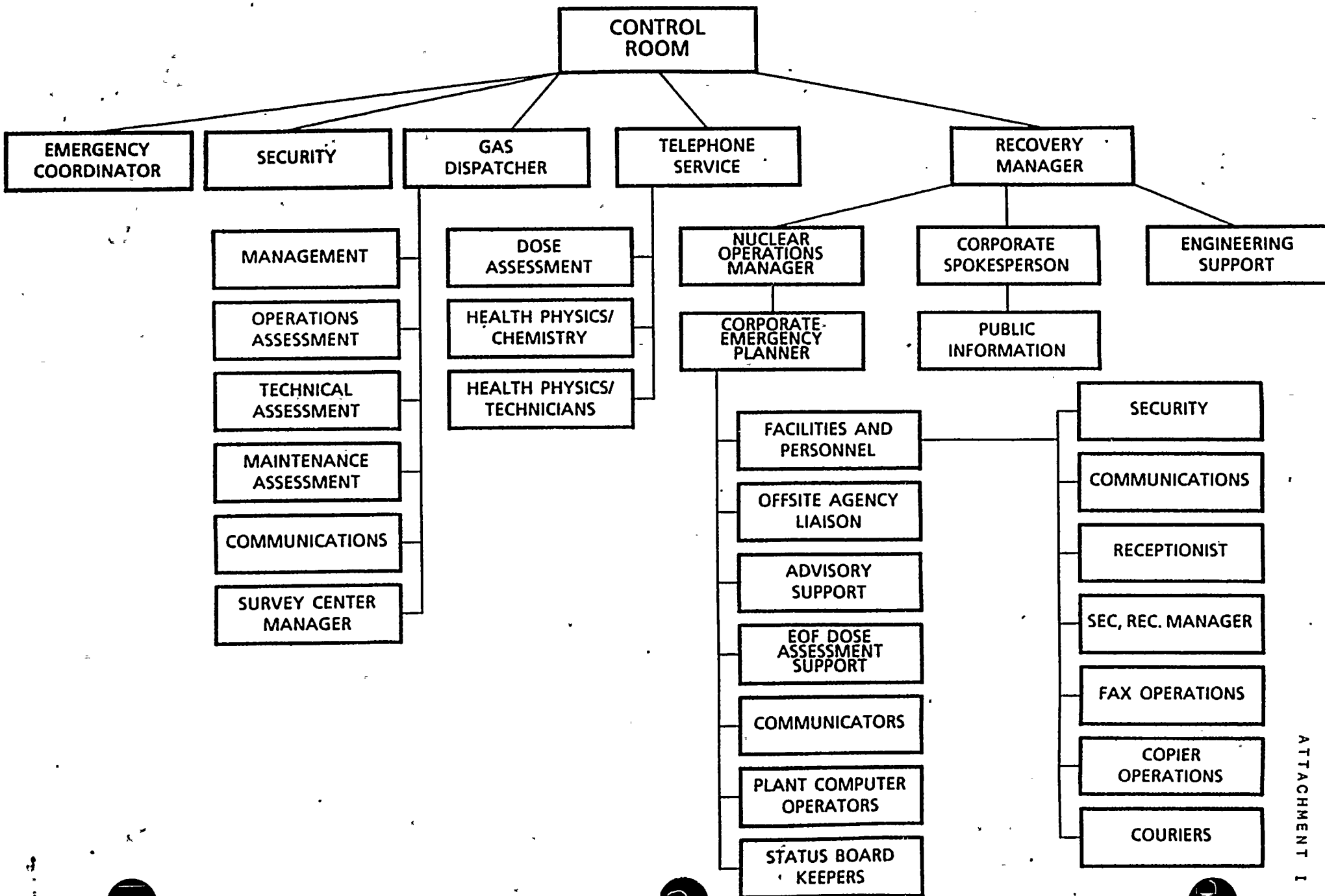
A handwritten signature in cursive script that reads "Roger W. Kober". The signature is written in dark ink and has a long, horizontal flourish extending to the right.

Roger W. Kober

Attachment



ROCHESTER GAS AND ELECTRIC CORPORATION GINNA NOTIFICATION PROCESS



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