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 FACIL:50-244 Robert Emmet Ginna Nuclear Plant, Unit 1, Rochester G 05000244
 AUTH.NAME AUTHOR AFFILIATION
 SNOW,B.A. Rochester Gas & Electric Corp.
 RECIP.NAME RECIPIENT AFFILIATION
 NRC - No Detailed Affiliation Given

SUBJECT: Forwards util response to Generic Ltr 88-02 re ISAP II.
 Participation in program declined.

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February 22, 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 Letter 88-02:
Integrated Safety Assessment Program (ISAP) II
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Stahle:

Attached is RG&E's response to Generic Letter 88-02. Based on our review of the provisions of ISAP II, RG&E does not choose to commit to such a program at this time. The industry/NRC seminars mentioned in the Generic Letter would help to address concerns that RG&E has regarding ISAP II and could lead to a commitment to the program at a later date.

Very truly yours,

Bruce A. Snow
Superintendent
Nuclear Production

Attachment

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Integrated Safety Assessment Program (ISAP) II

Response Format to Generic Letter 88-02

Facility Name: R.E. Ginna Nuclear Power Plant

Utility: Rochester Gas & Electric Corp.

Individual Contact Name: Bruce A. Snow Phone Number: (716) 724-8058

An expression of interest will not be considered a commitment to participate on the part of the utility.

1. Would you be interested in participating in ISAP II? If so, in what time-frame?

The ramifications of participating in ISAP II are not clear at this time. Additional information is needed before RG&E's level of interest can be determined.

2. Do you believe that an industry/NRC seminar consisting of a brief discussion by NRC followed by a question and answer period would be beneficial prior to making a decision?

Such a seminar is essential. It would be useful to hear from ISAP and SEP participants, as well as NRC management (NRR and the Regions).

3. Would you be interested in a one-on-one meeting with the NRC to discuss your particular facility or facilities?

Not at this time. Perhaps after the seminars.

4. If you remain undecided regarding participation, what additional information do you need in order to make a decision?

The seminars would be the proper forum for RG&E to determine our potential interest in ISAP II.

5. Do you have any potential concerns about participating in ISAP II?

See attached sheet.

6. Do you have any suggestions for program improvements or changes?

Not at this time.

Response to Item 5: Do you have any potential concerns about participating in ISAP II?

RG&E recently experienced the Systematic Evaluation Program. Based on that experience, RG&E has some concerns. For example:

- 1) ISAP II covers NRC and utility-initiated issues. Other organizations which could influence changes at the facility, such as INPO and NUMARC, also need to be integrated into the modifications/commitment process.
- 2) There needs to be assurance that utility-initiated changes will receive appropriate and timely NRC review and approval.
- 3) The process for delaying or deferring modifications resulting from Commission orders and regulations, if of low safety benefit, needs to be delineated.
- 4) There must be assurance that agreements reached within ISAP II are maintained, and that future reviewers (either in the Region or other branches in NRR) are not allowed to re-initiate actions without compelling reasons.
- 5) It is not clear that ISAP II needs to be a license condition. A commitment by the utility to keep an agreement with the NRC should be sufficient.
- 6) The schedule for ISAP II needs to be integrated with a reasonable schedule for IPE (or PRA). The concept should be maintained for the life of the plant. It is not clear what the 54 week schedule means.