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April 11, 1985

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

Subject: Systematic Assessment of Licensee Performance
R. E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Dr. Murley:

The purpose of this letter is to provide you with our comments on your Systematic Appraisal of Licensee Performance Report for Ginna Station dated March 8, 1985.

RG&E appreciated the opportunity to meet with you and members of your staff to discuss our efforts over the assessment period. We acknowledge your conclusions in each of the functional areas but wish to provide the following clarifying information, as we discussed in our meeting.

Under Section IV.B, Radiological Controls, it was stated that lack of formal ALARA review of outage work planned and directed from the corporate level may be a contributing factor to an increasing trend in man-rem exposure. In fact, the man-rem exposure for 1984 was 370 man-rem. This is the lowest exposure level since 1970, the initial year of plant operation. In addition, although we are reviewing additional formalization and emphasis on ALARA reviews, significant efforts and expense have been devoted in the past to reducing radiation exposures in work which is directed from the corporate level. Examples of work in which this has been the case include modifications such as the piping seismic upgrade program and maintenance activities such as steam generator sleeving. Thus, we believe the NRC comment concerning radiation exposures is incorrect.

As we discussed in our meeting with you, we have established a management level task force to review Quality Assurance/Quality Control functions, including a review of the issues which you raised in Section IV.J, Quality Assurance/Quality Control. The task force will be providing recommendations to the company's senior management by August 1, 1985. Although we have taken these steps and intend to strengthen these organizations, we believe that two of the examples provided in Section IV.J of the report are ambiguous or overstated.

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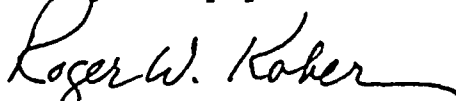
DATE April 11, 1985

TO Mr. Thomas E. Murley

Regarding audits of Nonconformance Reports (NCRs), the Ginna Corrective Action Program, which is utilized for obtaining timely corrective action for significant deficiencies adverse to quality, has always provided for escalating the NCRs which meet the significant deficiency guidelines. These escalated NCRs have been subject to the semi-annual audits. Thus, although the unescalated, and therefore not significant, NCRs were improperly omitted from the semi-annual audits, this failure should not have impacted audit review of significant deficiencies. Also, in the same paragraph, and in need of clarification, is your reference to "corporate auditors" to differentiate from "QA auditors". In fact, they are the same. Regarding implementing the QA program requirements for level D storage areas, with one exception, all storage requirements have been appropriately specified and implemented at Ginna Station consistent with the governing ANSI Standard Guidelines. The one exception was in not providing access control to outside storage areas that contain materials which are typically large and would often require more than one person and/or a vehicle to move. Although the oversight did exist, it is not one which is easily recognized, and therefore, in itself, not a basis for inferring that all QA program requirements for level D storage areas have not been implemented. Corrective action has been completed with respect to both these items.

We have no comments on any other area of your report.

Very truly yours,



Roger W. Kober

