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 FACIL: 50-244 Robert Emmet Ginna Nuclear Plant, Unit 1, Rochester G 05000244
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 KOBER, R. W. Rochester Gas & Electric Corp.
 RECIP. NAME RECIPIENT AFFILIATION
 THOMPSON, H. Division of Licensing

SUBJECT: Responds to Generic Ltr 85-07, "Implementation of Integrated Schedules for Plant Mods." Informal integrated living schedule already in effect & proven functional. No incentive exists to formalize program.

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1. The first step in the process of identifying a potential threat to national security is to determine the nature of the threat. This involves a thorough analysis of the threat's source, its objectives, and its potential impact on the United States. The next step is to assess the threat's likelihood of occurring and the potential damage it could cause. This is followed by a determination of the resources available to counter the threat and the development of a response plan. Finally, the response plan is implemented, and the threat is neutralized.

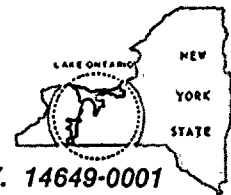
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ROCHESTER GAS AND ELECTRIC CORPORATION • 89 EAST AVENUE, ROCHESTER, N.Y. 14649-0001



ROGER W. KOBER
VICE PRESIDENT
ELECTRIC & STEAM PRODUCTION

August 6, 1985

TELEPHONE
AREA CODE 716 546-2700

Director of Nuclear Reactor Regulation
Attention: Mr. Hugh Thompson, Director
Division of Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Generic Letter 85-07 "Living Schedules"
R. E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Thompson:

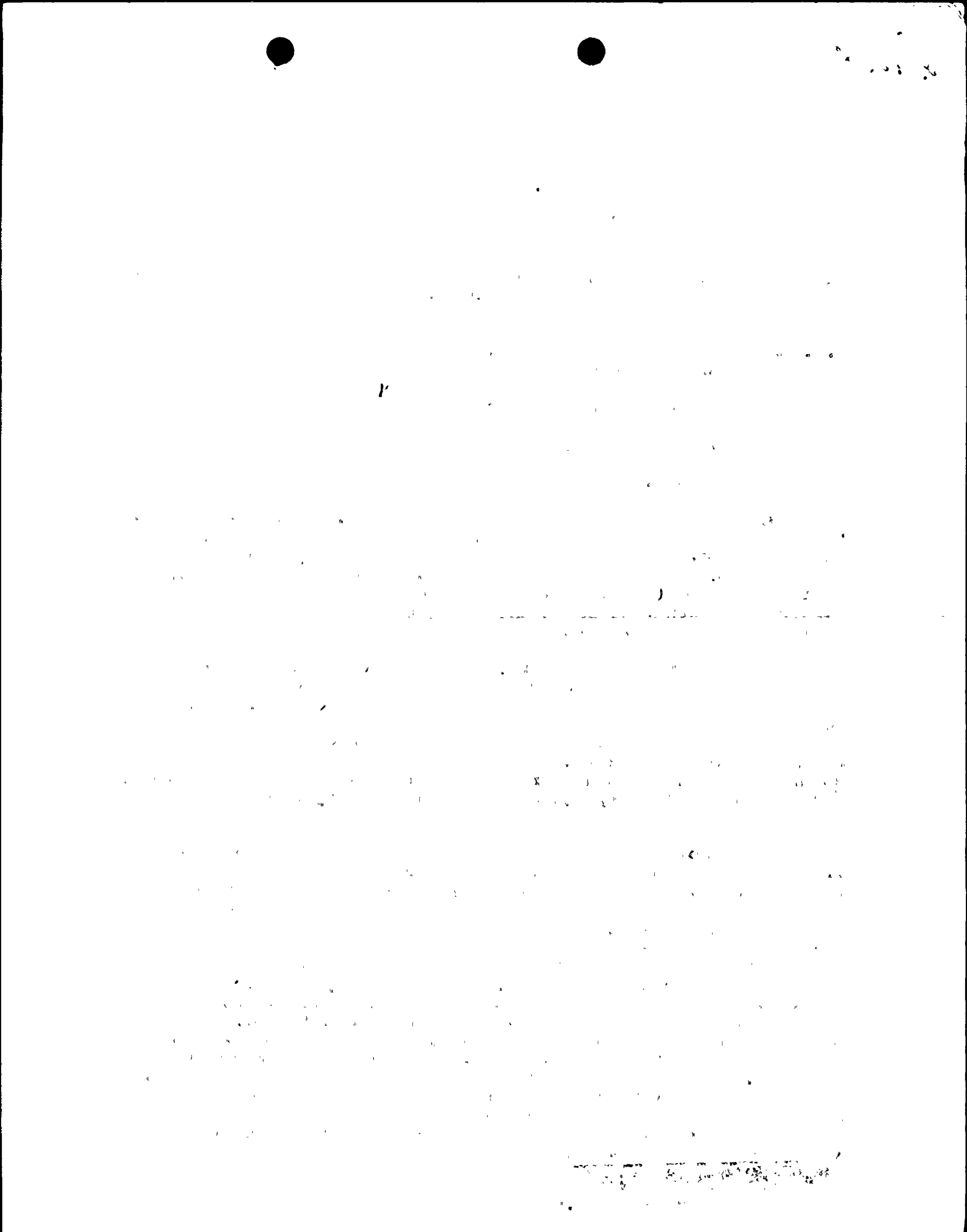
This letter provides our response to NRC Generic Letter 85-07 "Implementation of Integrated Schedules for Plant Modifications". In the letter, it was requested that each utility provide the NRC with its intentions regarding implementation of an Integrated Living Schedule (ILS), similar to what has been set up in cooperation with Iowa Electric, using the format suggested in Enclosure 2 of 85-07. The response form is attached.

RG&E believes that we are, as a result of years of licensing experience and participation in the Systematic Evaluation Program, effectively implementing an ILS at this time. We maintain an integrated schedule through our normal budget review process. All known projects are included and additions or changes are reviewed by the appropriate individuals. If changes are required in NRC commitments, the reasons for the required changes are provided to the NRC and a mutually agreed upon schedule adjustment is established.

We do not feel compelled to formalize an ILS program, with its resultant additional NRC negotiations, and additional documentation, because we believe it will simply result in the same program plan we are now following, plus add the burden of an expanded commitment tracking system as well as a formal prioritization system. We stress that our experience has been satisfactory in large part due to the agreements reached during recent major licensing reviews, such as the Systematic Evaluation Program, where the NRC asked RG&E to set up modification schedules consistent with our abilities, including scheduling of RG&E initiated modifications (maintenance, plant betterment, upgrades, etc). This philosophy must be maintained, both within NRR and Region I, in order for us to continue our positive experience. Especially important is the continuation of strong and effective project management, which we have had the benefit of during the past many years, and the timely promulgation of backfitting reform (revision of 10CFR50.109).

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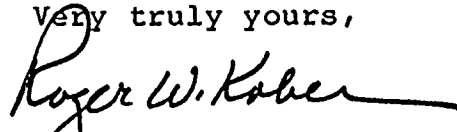
ROCHESTER GAS AND ELECTRIC CORP.

SHEET NO. 2

DATE August 6, 1985
TO Mr. Hugh Thompson

In summary, RG&E has had in effect an informal ILS, have been pleased with its implementation, and thus do not have any incentive to add to RG&E and NRC documentation burden by formalizing the program. We trust this satisfactorily responds to your concerns, and provides the incentive to maintain dialogue and negotiations regarding modification schedules at the highly satisfactory level that they have been.

Very truly yours,



Roger W. Kober



ENCLOSURE 2

RESPONSE FORMAT - GENERIC LETTER 85-

PLANT NAME: R. E. Ginma Nuclear Power Plant

UTILITY: Rochester Gas and Electric Corporation

I. INTENTIONS

- A. Intend to work with the staff to develop an ILS _____
- B. Have reservations that must be resolved before developing ILS _____
- C. Do not presently intend to negotiate an ILS with the staff _____
- D. Plan to implement an informal ILS only x

II. STATUS

A. If you answered I.A above:

1. Have you settled on a method for prioritizing the work at your plant(s)?

Circle One: Yes No

If yes, select best description:

Engineering judgement _____
Analytic Hierarchy process _____
Risk based analysis _____
Cost-benefit analysis _____
Other (please describe) _____

If no, provide estimated date for selecting a methodology:

_____ Date

or

If not presently available, provide estimated date for scheduling the selection of a methodology: _____

2. What is your estimated date for making a submittal to the NRC- _____

or

If not presently available, planned date for scheduling a submittal to the NRC _____

B. If you answered I.B above:

1. Please explain your reservations on separate sheet(s) or provide your schedule for supplying an explanation

See separate sheet(s)

or

Separate submittal scheduled for

(Date)

2. If available to meet with the staff to discuss your concerns, propose a time frame for such a meeting and provide a contact that can make arrangements

Contact/Time Frame _____

Phone Number _____

C. If you answered I.C

1. Would you be willing to meet with the staff to discuss the development of an ILS for your facility(s)?

Circle One: Yes No

If yes, propose a time frame for such a meeting and provide a contact that can make arrangements.

Contact _____

Time Frame _____

Phone Number _____

If no, any constructive comments you have would be appreciated.

III. ADDITIONAL ITEMS

Please make any suggestions you may have as to how a utility sponsored availability/reliability project might be credited for plant safety enhancement. Provide additional constructive comments as appropriate.