



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

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August 15, 1983

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 regarding your Systematic Assessment of Licensee Performance report for Ginna Station dated July 15, 1983.

My staff and I appreciated the opportunity to meet with you and discuss Rochester Gas and Electric's operations and licensing efforts over the assessment period.

Regarding your report on the appraisal of Ginna's performance, the following is offered:

In general, we do not disagree with your assessment. We acknowledge your conclusion that our performance in each functional area evaluated was acceptable and reflected our management commitment to safety. There are some points that we wish to clarify or expand as we have discussed in our meeting.

Your assessment identified several areas as requiring additional management attention and controls which had previously been identified in Inspection Report 83-16 and in the Enforcement Conference on June 1, 1983. We have applied the additional management attention and have developed and implemented additional reviews and controls which we expect will result in improvements.. Should it become apparent that additional steps beyond those already identified are desirable, these will be promptly developed and implemented.

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DATE August 15, 1983

TO Dr. Thomas E. Murley

Under Plant Operations, it was indicated that, without Inspector intervention, it appeared likely that a PORC meeting would not have been held prior to reinitiating a maintenance evolution which had resulted in a loss of decay heat removal. As discussed previously with our Resident Inspector, while no formal mechanism would have prevented this, management attention had led to agreement with the job supervision that no activities that could lead to a recurrence would be reinitiated without PORC and management review of the incident.

In Section 4.2, the comment was made that "ALARA and external exposure efforts have been improved although more attention should be given to the completeness of documentation." In discussions with members of your Staff subsequent to our July 21 meeting, we were informed that the basis for the comment regarding documentation related to assumptions for dose analysis in a safety analyses for a plant activity. In that instance, it was acknowledged by NRC that the conclusions were conservative. Since the comment in your report was based on one isolated occurrence, and since, in our organizational structure, the preparation of the safety analysis does not fall within the responsibilities of the ALARA program or of the external exposure control area, we believe the statement in your report could be misleading regarding these two areas. As we have previously noted to your Staff, we will continue to give close review to Safety Analysis and other documentation. Even with this correction, we do not disagree with your overall assessment of this area.

We have no specific comments in any other area.

Very truly yours,



John E. Maier

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