

# REGULATORY INFORMATION DISTRIBUTION SYSTEM (GRIDS)

ACCESSION NBR: 8304220169 DOC. DATE: 83/04/15 NOTARIZED: NO DOCKET #  
 FACIL: 50-244 Robert Emmet Ginna Nuclear Plant, Unit 1, Rochester G 05000244  
 AUTH. NAME: MAIER, J. E. AUTHOR AFFILIATION: Rochester Gas & Electric Corp.  
 RECIP. NAME: CRUTCHFIELD, D. RECIPIENT AFFILIATION: Operating Reactors Branch 5

SUBJECT: Responds to Generic Ltr 82-33 (NUREG-0737, Suppl 1) re safety parameter display sys, detailed control room design reviews & emergency response facilities. Proposed response schedule encl.

DISTRIBUTION CODE: A0038 COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 5  
 TITLE: OR/Licensing Submittal: Suppl 1 to NUREG-0737 (Generic Ltr 82-33)

NOTES: NRR/DL/SEP 1cy.

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Adel. W. Paulsen

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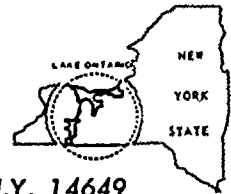
1. The purpose of this document is to provide a comprehensive overview of the project's progress and to identify any potential risks or issues that may arise. This document is intended for the use of the project manager and the steering committee.

2. The project has been successfully completed and all objectives have been met. The project team has worked hard to ensure that the project is on track and that all deliverables are of high quality.

3. The project has been completed and all objectives have been met. The project team has worked hard to ensure that the project is on track and that all deliverables are of high quality.

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Project Name		Project Manager		Project Status	
Project A	Project A - Phase 1	John Doe	Completed	On Track	High
	Project A - Phase 2	John Doe	In Progress	On Track	Medium
	Project A - Phase 3	John Doe	Not Started	On Track	Low
	Project A - Phase 4	John Doe	Not Started	On Track	Low
	Project A - Phase 5	John Doe	Not Started	On Track	Low
Project B	Project B - Phase 1	Jane Smith	Completed	On Track	High
	Project B - Phase 2	Jane Smith	In Progress	On Track	Medium
	Project B - Phase 3	Jane Smith	Not Started	On Track	Low
Project C	Project C - Phase 1	Mike Johnson	Completed	On Track	High
	Project C - Phase 2	Mike Johnson	In Progress	On Track	Medium



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JOHN E. MAIER  
Vice President

TELEPHONE  
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April 15, 1983

Director of Nuclear Reactor Regulation  
Attention: Mr. Dennis M. Crutchfield, Chief  
Operating Reactors Branch No. 5  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Subject: NUREG-0737 Supplement 1 (Generic Letter 82-33)  
R. E. Ginna Nuclear Power Plant  
Docket No. 50-244

Dear Mr. Crutchfield:

Darrel Eisenhower's letter dated December 17, 1982 provided additional clarification of NUREG-0737 items regarding safety parameter display systems, detailed control room design reviews, Regulatory Guide 1.97, emergency response facilities, meteorological data and emergency operating procedures. The letter requested a proposed schedule for completing each of the items addressed.

Attachment A to this letter contains a proposed schedule. We recognize your need to establish completion dates and appreciate the opportunity to participate in an interactive scheduling process. We also recognize that changing regulatory requirements and new regulatory requirements which may be imposed in the future dictate that any schedule remain flexible so that the highest priority goals can be met.

RG&E will, in the near future, develop an integrated schedule for all activities and modifications planned at Ginna. The schedule will include modifications resulting from regulatory activities, including SEP reviews, Appendix R compliance and post-TMI requirements among others and will also include work which is necessary to maintain plant production and efficiency. It is anticipated that this overall backfit schedule, as a master schedule, may cause some changes to the schedule given in the attachment to this letter. Nevertheless, we are providing this schedule for NUREG-0737 Supplement 1 items as our current best estimate for completion.

We look forward to continued dialogue with you in establishing mutually agreed upon priorities.

Very truly yours,

*John E. Maier*  
John E. Maier

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## Attachment A

This attachment addresses Supplement 1 to NUREG-0737, Requirements for Emergency Response Capability, provided by Darrel Eisenhower's letter dated December 17, 1982 (Generic Letter 82-33). Each of the five items addressed in Supplement 1 is discussed in this attachment. That is, the Safety Parameter Display System (SPDS), Detailed Control Room Design Review (CRDR), Regulatory Guide 1.97, Upgraded Emergency Operating Procedures (EOPs), and Emergency Response Facilities are discussed individually below. The schedules for each of these items have been integrated and appear on Table 1. It is the interrelationships between the various tasks of the five items which determine the overall schedule for completion.

The schedules given in this attachment have been put together considering only the Supplement 1 items. Other regulatory requirements such as SEP topic resolutions for structural upgrade and flood protection, Appendix R compliance for fire protection, and other plant modifications such as steam generator sleeving and moisture separator reheater installation, which are desirable to increase plant reliability, all affect the Supplement 1 item schedules. RG&E is beginning the process to integrate and schedule all the plant modifications and activities which significantly impact company resources. As the whole of company commitments is molded into a single overall backfit schedule, individual tasks for Supplement 1 items may be assigned higher or lower priorities and thus the schedule shown in Table 1 may change. RG&E believes that a mutually agreed upon schedule is a reasonable and effective way to accomplish plant modifications which will meet those goals of highest priority.

### Safety Parameter Display System

The SPDS, a subset of the Safety Assessment System (SAS) being implemented at Ginna, has been under development for 3 years. The equipment specification for this system was provided in our letter dated June 8, 1981. The specification defines the parameters which have been built into the system. The parameters were selected based upon those needed to diagnose a wide range of transient events and to assess plant safety during normal operation and during and following accidents. The nature of the generic SAS and the parameters selected were discussed in meetings with the NRC staff on May 14, 1981 in Bethesda, Maryland and during simulator validation at Indian Point on April 14, 1982. At the time of the CRDR control room survey, a comparison of the control room instrumentation against the EOP requirements will be made. At that same time a comparison of the SAS displays with the EOPs will also be made to verify the adequacy of the parameters selected.

Staff review of the Ginna SAS can be performed based upon the information submitted in 1981 and the review meetings held with



the staff. Our current schedule for completing the SAS is to install equipment in mid 1984 and have the system operational in late 1985.

#### Detailed Control Room Design Review

RG&E has requested bids from several firms specializing in human factors engineering to add to our CRDR team. We expect to receive proposals and to be able to select a successful bidder by July, 1983. Development and approval of a program plan will take approximately 6 months after the composition of the team is complete. Those portions of the CRDR which can be performed independent of plant procedures will be completed by August of 1984. These activities include the control room survey, review of operating experience and interviews with plant operators. Task analyses and a walkthrough of emergency procedures will be coordinated with the emergency procedure writing activities. The task analyses and walkthrough can be completed about six months after the first draft EOPs are completed or about February 1985. A summary report of the completed review will be submitted by December 1985. Justification for human engineering discrepancies to be left uncorrected and a schedule for implementing proposed control room changes will be included in the summary report.

#### Regulatory Guide 1.97

The R. E. Ginna plant currently has adequate instrumentation to diagnose and monitor plant transients. Most of the instrument types addressed by Regulatory Guide 1.97 exist at the Ginna plant. The exceptions are reactor vessel water level and continuous RCS activity. RG&E has committed to install a reactor vessel level device. In some cases the range of the existing instruments does not fully meet the ranges suggested by the Regulatory Guide. Some of the current instruments were installed in accordance with the requirements of NUREG-0737 which gave required ranges different from Regulatory Guide 1.97. In each case, however, RG&E believes the ranges to be adequate to monitor accident conditions at the Ginna plant.

A review of our existing instrumentation against the EOP guideline requirements is scheduled to be performed during late 1983. A comparison of the Ginna instrumentation with Regulatory Guide 1.97 will be made at that time. Deviations that exist will be noted and justification will be provided. Submittal of this comparison report is expected to be in early 1984.

#### Emergency Response Facilities

RG&E has constructed or otherwise provided physical facilities to meet the requirements for an Operations Support Center (OSC), Technical Support Center (TSC) and Emergency Operations Facility (EOF). Although the final information processing system (SAS) has not been completed, all these facilities were demonstrated to function adequately during the





Ginna tube rupture incident on January 25, 1982. The NRC staff review of these facilities, published in NUREG-0909, found the facilities adequate for the intended purposes. Since that time the EOF has been relocated from 89 East Avenue to the basement of 49 East Avenue. All of the response capability of the original facility has been retained and improved.

Installation of a new plant process computer and Safety Assessment System (SAS) at Ginna, which will provide information to the TSC and EOF, will complete the emergency response facilities. The SAS installation schedule is addressed elsewhere in this document.

Additional information describing our emergency response facilities and other aspects of our emergency response capabilities has been provided in RG&E letters dated December 28, 1979, April 28, 1981, May 1, 1981, June 8, 1981, July 1, 1981, February 1, 1982, June 11, 1982, December 7, 1982, December 29, 1982 and March 7, 1983. RG&E responded on June 30, 1982 and September 30, 1982 to Emergency Preparedness Appraisal 50-244/81-22.

#### Upgraded Emergency Operating Procedures

RG&E has begun work on the EOP upgrade and has nearly completed the plant specific writers guide. Manpower limitations may require that the actual procedures writing be done by an outside contractor; review of vendor capabilities has begun. Although a schedule that we have confidence will be met cannot be submitted at this point, a preliminary schedule has been developed that is our best estimate. It is shown on Table 1.

We anticipate selecting a vendor or establishing an RG&E team for procedure writing in June 1983. At that time a firmer schedule can be established. Important milestones include submittal of the Procedures Generation Package (PGP) in late 1985, six months prior to the beginning of training on the EOPs. The PGP will include the writers guide and plant specific technical guidelines and will describe the validation program and the training program for implementing the EOPs. The final EOPs should be in use in late 1986 following completion of the validation and training programs. An integrated validation for emergency response capability, including validation of the EOPs, is anticipated to be performed.



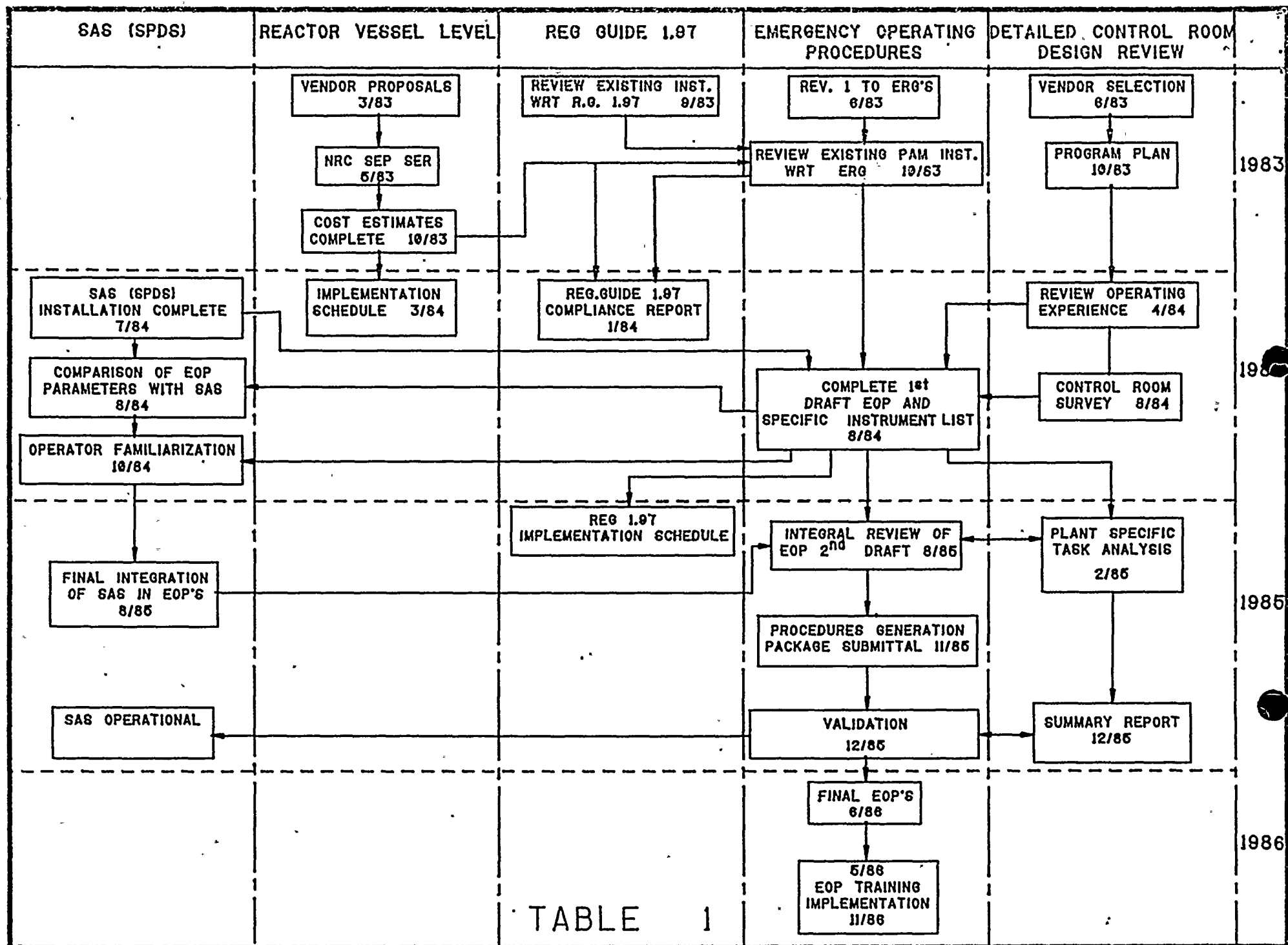


TABLE 1

