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SUBJECT: Comments on SEP,Phase II,SEP-like program incorporating
 experience of SEP (minimal topics,acceptable alternative to
 SRP & integrated assessment) is of safety benefit.

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July 30, 1982

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: Comments on Systematic Evaluation Program, Phase II
R. E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Crutchfield:

In your letter of July 14, 1982 on this subject, you requested that Rochester Gas and Electric provide information on our experience with Phase II of the Systematic Evaluation Program, so as to aid the NRC in the development of future phases of SEP. While it would appear that the timing and format for SEP Phase III is already firmly established, we offer our comments in the hope that the program plan for extension of the SEP will incorporate our and other utility comments.

First of all, we would like to commend the recent technical review conduct of the SEP, where judicious engineering judgment was used in the evaluation of differences from the Standard Review Plan criteria. Although the consideration and acceptance of alternatives to the Standard Review Plan should not be uncommon, since the SRP is explicitly defined as a way (not the only way) to meet current regulatory criteria, the fact is that the SRP has often in practice been considered inviolate. During the latter stages of the Ginna SEP, substantial progress toward topic resolution was made only when there was acceptance of suitable alternatives. Hopefully, the beneficial experience gained during this process will be continued not only by the SEP staff, but extended to the NRC in general.

Secondly, RG&E finds the concept of "Integrated Assessment" to be of great benefit. This concept has allowed us to provide for the concurrent evaluation and design of several issues related

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to a particular safety-related item, thus resulting in a more optimal cost-effective single solution. Again, we trust that the knowledge gained in the use of this concept during SEP can and will be extended to other NRC reviews.

But not all of our reactions to the SEP are positive. There are many lessons learned during the conduct of SEP Phase II for Ginna, which should be factored into the review of the other Phase II plants, as well as the Phase III program, if that is considered necessary. Your July 14 letter requested that we address five points. These are discussed below, together with comments on problems that have been encountered, and potential improvements:

- (1) The program should establish documentation that shows how the criteria for each operating plant reviewed compared with current criteria on significant safety issues, and should provide a rationale for acceptable departures from these criteria.

This objective has largely been met. Unfortunately, much time was wasted during the initial stages of SEP, when proposed topic resolutions different from the prescripts of the SRP were not often accepted. As noted earlier, this attitude changed during the latter stages of SEP. Hopefully, the explicit use of acceptable alternatives to the SRP, based on the Palisades and Ginna experience will be encouraged by the NRC staff. If such "revised criteria" are defined in the topic definitions, we expect that this would save significant review effort, both by the licensees and NRC staff.

As for the documentation effort itself, we find that this has not been completely satisfactory. All too often, the topic assessments (especially the final SER's) do not include all references needed to comprehend how the final decision was made. Especially absent are direct quotes or, in some cases, even references to licensee-supplied information and studies. A greater effort should be made to acknowledge all relevant sources of information pertaining to topic resolutions, especially if the acceptance of a topic was on a basis of "equivalence" to the SRP. However, RG&E reserves final judgment on the adequacy of the documentation since its usefulness will be tested in the ability to respond to future licensing requests.

- (2) The program should provide the capability to make integrated and balanced decisions with respect to any required backfitting.

As noted earlier, the concept of "Integrated Assessment" for making backfitting decisions is one of the generic benefits derived from our experience with the SEP. One element still

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missing, however, is an appreciation by NRC staff of the schedular requirements in designing and installing plant modifications. Even now, in the draft Safety Evaluation Report, the NRC staff attempts to dictate extremely tight schedules, which are inconsistent with field experience for making modifications, and which do not account for other (not necessarily SEP) modifications that the licensee is attempting to integrate into a particular resolution. We believe that a project manager, who has technical experience as well as schedular authority, would be extremely useful in discussing and evaluating, both with the NRC staff and the licensee, a "living schedule" for all integrated backfit decisions.

- (3) The program should be structured for early identification and resolution of any significant deficiencies.

This objective of the program has, we believe, been met with regard to the Ginna plant. For Ginna, only the topics of "environmental qualification" and "seismic anchorage" of electrical equipment were selected for early review.

- (4) The program should assess the safety adequacy of the design and operation of currently licensed nuclear power plants.

The Ginna Station has, of course, not yet been completely evaluated against all of the SEP topics. Several relatively important issues remain open for final resolution. Indications are, however, that the SEP will provide a suitable basis for judging that Ginna Station has adequate safety margins for continued safe operation. RG&E makes this judgment contingent on the continuation of recent experience within the SEP that safety adequacy be assigned on a basis of potential risk, rather than on strict adherence to the Standard Review Plan. The final resolution of the two major natural phenomena issues, flooding and tornado protection, will in large measure determine the success of the use of this vital SEP concept. As with other SEP Integrated Assessment topics, the final resolution of these topics should be negotiated with the SEP branch, rather than the technical review branches.

The review of operating history contained in the Integrated Assessment was also useful, if a bit short. Earlier and more comprehensive Regional input would probably have improved this section of the report.

- (5) The program should efficiently use available resource and minimize requirements for additional resources by NRC or industry.

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As is probably obvious from the protracted duration of this program, efficient use of resources was not always accomplished. The lack of program definition, lack of personnel within the NRC, and high turnover among NRC reviewers early in the program, as well as the impact of TMI, resulted in the loss of several years. More recently, the overriding emphasis on schedule has restricted the opportunity to efficiently prepare and coordinate responses.

RG&E notes that, to date, a total of \$2.7 million has been expended by RG&E for in-house engineering and administration, consultant manhours and analyses, and hardware modifications. However, several significant studies and modifications, including the Structural Upgrade Program (wind and tornadoes), High Energy Line Break, Flooding, and Containment Isolation valves, have not yet been completed. We believe that a more efficient use of resources, especially by the deletion of topics considered of marginal safety benefit, would have enhanced the "worth" (cost-benefit) of the SEP. We hope that the experience gained during the conduct of SEP for Ginna and Palisades will be used, both during the completion of SEP Phase II, and in any similar forthcoming programs. We are not heartened by a brief review of the Millstone I, Oyster Creek, and Dresden II topic difference summaries where, in many instances, only a simple comparison of conformance to the SRP is noted. This is done even in instances where the judgment had been made for Ginna and/or Palisades that SRP criteria should not be backfitted (Topic VI-10.A, Response Time Testing, for example). We believe the NRC should make an effort now, when it will be most beneficial, to minimize useless comparisons with the SRP, but should instead define alternative acceptance criteria, where experience dictates such to be the case. We trust that arbitrary topic progress schedules do not restrict the ability of the NRC to perform this valuable service.

This leads us to the salient point of this letter: given Phase II, should there be a continuation of SEP in some form. Our response is a cautious "YES . . . BUT . . ." During the SEP review for Ginna, certain safety improvements were denoted, whose implementation will provide additional useful safety margin. These include the seismic and tornado reviews, as well as high energy line break reviews. However, it is our understanding that the present program plan for Phase III of SEP only minimally reduces the issues to be reviewed (although the number of topics is reduced due to consolidation of Phase II topics). If this is true, then the continuation of SEP will not incorporate the most important finding of SEP Phase II: that a great majority of the

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safety benefit from SEP came from the review of only a handful of topics. We do not believe that the incorporation of a large number of minor changes to the plant procedures and hardware resulted in any substantial safety benefit (e.g., SEP Topics III-3.C; Inservice Inspection of Water Control Structures, V-10.A, RHR Reliability (procedure for cold shutdown), XV-19, LOCA (protective tube over pushbutton)).

It is a prevailing (and not altogether incorrect) NRC philosophy that minor changes, even of relatively low safety benefit, should be made if the change is easy and inexpensive. Although this shows an appreciation of the concept of cost-benefit analysis, it should not be the basis for initiating a major safety review of nuclear power plants. In order to provide the greatest safety benefit, while not diverting precious manpower resources on the review of trivial topics, the list of safety issues should be trimmed to a manageable ten to twelve per plant. These should be selected by the SEP branch and each individual utility. Judicious selection by knowledgeable people will prevent an unaffordable waste of resources, which can be better utilized in the review of other important non-SEP pursuits, such as an increase in plant operational safety, and resolution of unresolved safety issues.

RG&E further believes that not all presently operating plants will be required to perform an ongoing SEP-like review. Based on the conformance to current or equivalent regulatory criteria, we anticipate that a point will be reached (maybe within the next dozen plants) where all significant current regulatory criteria had effectively been implemented during the plant design. Any continuation of SEP should stop at that point.

We would also make the observation that a tool not used with any effective result for Ginna, but which may find better use in future reviews, is Probabilistic Risk Analysis. As presently perceived by the NRC, the use of PRA would be expanded in future topic reviews to gain additional risk perspective. We feel this will provide an additional focus to aid in making effective Integrated Assessment judgments. However, if the NRC encourages the use of PRA for future SEP-like reviews, the NRC should also allow the use of the results. This was not done during the Ginna review. In NUREG-0821, it can be noted that, of the eight issues reviewed via PRA (excluding topic V-5), seven were judged of low safety significance. In six of those seven cases, the NRC nevertheless required modifications to be made. Also, in order to be useful, a method for use of PRA in relation to extreme natural phenomena should also be found, since these particular topics have required the greatest amount of NRC and RG&E review during the course of the SEP of Ginna.

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In summary, RG&E concludes that an SEP-like program, incorporating the experience of SEP (minimal topics, acceptable alternative to the SRP, and Integrated Assessment) is of safety benefit.

Very truly yours,


John E. Maier

