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AUTH.NAME AUTHOR AFFILIATION
MAIER,J.E. Rochester Gas & Electric Corp.
RECIP.NAME RECIPIENT AFFILIATION
CRUTCHFIELD,D. Operating Reactors Branch 5

SUBJECT: Forwards preliminary response to NRC assessment of SEP Topic II-2.A, "Severe Weather Phenomena." Unnumbered refs impede verification of info. Design basis wind load will be provided, pending more detailed review.

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JOHN E. MAIER
VICE PRESIDENT

TELEPHONE
AREA CODE 716 546-2700

January 19, 1981

Director of Nuclear Reactor Regulation
ATTN: Mr. Dennis M. Crutchfield, Chief
Operating Reactors Branch #5
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: SEP Topic II-2.A, Severe Weather Phenomena
R. E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Crutchfield:

Enclosed is the Rochester Gas and Electric response to the NRC's assessment of SEP Topic II-2.A, "Severe Weather Phenomena". This response is necessarily based on a preliminary review, since it is only one response to the many (10) SEP topic assessments which RG&E received on December 18, 1980 (all of which are to be responded to before or on January 30, 1981). It is expected that additional comments will be forthcoming, following a more detailed review of this topic assessment.

Very truly yours,

John E. Maier

Enclosure

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Enclosure - Comments on SEP Topic II-2.A, "Severe Weather Phenomena"

1. It would be most useful if a reference were provided for all facts denoted in the safety evaluation. As presently formatted, the unnumbered references do not refer to any specific information. This makes it more difficult to review and verify the information presented.

2. Some references which are internal to the NRC are not available to us. These include the memo from Harold R. Denton to R. R. Maccary, March 24, 1975, and the memo from Jerry Harbour to L. G. Hulman of August 14, 1978. It would be useful for us to be able to review this information to better respond to the NRC assessments.

3. It is not discernable how the snow load of 150 psf was determined. A review of ANSI A58.1-1972 disclosed a 100-year recurrence roof snow load of approximately 40 psf. The New York State Code also requires a normal snow load of 40 psf to be considered for a flat roof. Even adding this and the maximum single storm snowload would result in a roof snow load of less than 60 psf. The basis for the Ginna roof load is provided on page 4-3 of the Ginna "Technical Supplement Accompanying Application for Full-Term Operating License," August 1972. The NRC evaluation should be consistent with this design basis, or provide specific reasoning and methodology for choosing an alternative basis.

4. It is not clear what Sterling PSAR data was used. Snow load data would be incorrect, since that site receives more snowfall than the Ginna site.

5. It is apparent, both from WASH-1300 and the Institute for Disaster Research (IDR) report appended to this NRC assessment, that tornadoes in the vicinity of the Ginna site are very rare. The IDR report notes that, for windspeeds < 109 mph, the straight wind model governs; for winds ≥ 109 mph, the tornado model governs. Table 8 of the IDR report notes that, for a mean recurrence interval of 10^5 years, the governing wind hazard would be a 103 mph straight wind. From this data, it appears that, on any reasonable design basis, (such as a hazard probability of 10^{-5}/yr, rather than 10^{-7}/year) tornado loadings for the Ginna plant need not be considered. As noted in the cover letter, RG&E has not had time to perform a detailed review of this assessment. We will, however, evaluate the available data and to the IDR report methodology, and determine a reasonable design basis wind load. This information will be transmitted to the NRC as it becomes available. Further correspondence should provide a final agreeable basis for evaluating the Ginna plant relative to wind loadings.