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 MECREDY, R.C. Rochester Gas & Electric Corp.
 RECIP. NAME RECIPIENT AFFILIATION
 Office of the Secretary of the Commission

SUBJECT: Comment supporting proposed rules 10CFR2,50 & 54 re
 nuclear power plant license renewal.

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DOCKET NUMBER
PROPOSED RULE PR 2150-154
(55FR29043)

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

ROBERT C. MECREDDY
Vice President
Ginna Nuclear Production

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TELEPHONE
AREA CODE 716 546-2700

October 12, 1990 OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Mr. Samuel J. Chilk
Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
Attention: Docketing and Service Branch

SUBJECT: Notice of Proposed Rulemaking:
Nuclear Power Plant License Renewal
55 Fed. Reg. 29,043 (July 17, 1990)

Dear Mr. Chilk:

In accordance with the above-referenced Notice of Proposed Rulemaking (the Notice), the Rochester Gas and Electric Corporation hereby submits the following comments and, as well, fully endorses the NUMARC comments being submitted on this matter. We appreciate this opportunity to express our views on the promulgation of a regulation to govern the renewal of nuclear power plant licenses.

We generally support the proposed regulation and urge the NRC to promulgate it with the modifications proposed in the NUMARC comment letter. In particular, we support the use of the current licensing basis (CLB) for a nuclear power plant to renew its license; we also support the applicability of the backfitting rule to license renewals. However, we share the concerns expressed in the NUMARC submittal regarding the definition of current licensing basis and whether an application for a renewed license should require an Integrated Plant Assessment (IPA) on the scale that is presently contemplated.

The proposed CLB definition appears to freeze the CLB during the pendency of license renewal applications before the NRC. CLBs continuously change over time to accommodate changing safety information and regulations. Such a moratorium could cause unwarranted shutdowns and discourage utilities from the license renewal option.

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The IPA contained in Section 5.4.2.1(a) of the proposed rule requires age-related degradation of the facility's systems, structures, and components (SSCs) to be identified, evaluated, and accounted for as needed to assure the facility's licensing basis will be maintained throughout the renewed term. We share NUMARC's concern regarding the scope of SSCs to be evaluated. We feel they may be interpreted too broadly and the depth of evaluations to be performed on components making up systems is more extensive than necessary to support the finding that aging is being managed during the renewal term.

We believe this issue to be important to the nation and congratulate the NRC on the diligence in the development of this rulemaking.

Very truly yours,


Robert C. Mecredy

BAS\086

xc: Mr. Allen R. Johnson (Mail Stop 14D1)
Project Directorate I-3
Washington, D.C. 20555

U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

Ginna Senior Resident Inspector

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Forwards Monthly Oper Rept for Sept, 1978.

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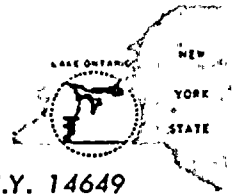
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ROCHESTER GAS AND ELECTRIC CORPORATION • 89 EAST AVENUE, ROCHESTER, N.Y. 14649

TELEPHONE
AREA CODE 716 546-2700

Ginna Station
October 6, 1978


Director, Office of Management Information and Program Control
U. S. NUCLEAR REGULATORY COMMISSION
Washington, D. C. 20555

Subject: Monthly Report for September, 1978
Operating Status Information
R. E. Ginna Nuclear Power Plant Unit No. 1
Docket No. 50-244

Dear Sir:

Pursuant to our Technical Specification 6.9.1, attached herewith is the monthly operating status report for Ginna Station for the month of September, 1978.

Very truly yours,


Bruce Snow
Superintendent

Attachments

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