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February 28, 1992

Mr. James H. Joyner
U.S. Nuclear Regulatory Commission
Region 1
475 Allendale Road
King of Prussia, Pennsylvania 19406

SUBJECT: Response to
Inspection Report No. 50-244/91-28
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Joyner:

This letter responds to the subject NRC inspection report which presents NRC's recent assessment of our Emergency Preparedness (EP) program. RG&E appreciates the constructive comments provided in the report and is addressing each recommendation for improvement in our program. NRC's recent assessments of our EP program have been very positive, and have noted continued successful exercise performance, our responsiveness to NRC improvement suggestions, and numerous program innovations and various good practices. We will assure that EP continues to receive strong management support in order to maintain existing program strengths and to pursue opportunities for program improvements.

Although a written response was not required, we believe it important to address some specific issues contained in Inspection Report 50-244/91-28 as follows.

1. Control Room Dose Assessment

At the time of Inspection 91-28, on-shift dose assessment guidance was contained in procedure EPIP 2-1 for a fast-breaking event involving a release through the main plant vent. This methodology had been in place for several years, and relevant procedures had been reviewed during the course of previous NRC Emergency Preparedness Inspections. For severe accidents, EPIP 2-1 concentrates upon plant conditions with dose assessment providing a supporting

role. Based upon the scrutiny given to Control Room accident response assessment procedures, we believed our approach to have been consistent with NRC philosophy and therefore acceptable.

We concur with the need for proper and timely dose assessment during potential fast-breaking events. The basis for RG&E's emergency response plan is to draw upon all resources appropriate for the severity of an abnormal event. During Inspection 91-28, the NRC team correctly identified a weakness in the ability to perform dose calculations for the purpose of classifying certain potential accident sequences. The Inspection Report describes a scenario used during the walk-through as a "steam generator tube rupture (SGTR) accident requiring an on-shift dose assessment." For completeness, it should be noted that the scenario assumed not only on SGTR but also the following concurrent events:

- Locked Reactor Coolant Pump Rotor
- High Primary Coolant Activity due to Failed Fuel
- Steam Generator Tube Rupture
- Stuck Open Atmospheric Relief Valve to the Environment
- Total Loss of Redundant External Communications
- Control Room Shift Supervisor Not Present or Available

Although the Control Room Shift had difficulty in performing a dose calculation under these extremely improbable and beyond design basis conditions, it was subsequently demonstrated that appropriate dose assessment capability exists within the TSC and EOF response organization.

RG&E understands the need for adequate accident assessment capability for fast-breaking events, particularly for purposes of proper emergency classification and protective action recommendations. We also note that the language contained in 10 CFR 50.47(b)(9) is extremely broad, and is subject to considerable interpretation. Nevertheless, RG&E accepts the violation as cited, and has initiated the following corrective actions which have been reviewed with NRC Region 1 staff:

o SHORT TERM ACTIONS:

- EPIP 2-18 (Control Room Dose Assessment) has been developed and approved by the Plant Operations Review Committee (PORC). This EPIP provides a streamlined means for the On-shift Radiation Protection Technician to perform site boundary dose rate calculations for all monitored atmospheric release vents.



- Training on EPIP 2-18 was conducted for all on-shift Radiation Protection technicians and completed on 1/30/92. Additional follow-up technician training was provided on February 24, 1992.
- EPIP 5-7 (Emergency Response Organization), EPIP 2-1 (Protective Action Recommendations) and EPIP 1-0 (Emergency Classification) procedures have been revised and PORC-approved, in order to clarify the Control Room dose assessment process.
- o LONG TERM ACTIONS:
 - Although other Control Room and Shift Technical Adviser staff will not be required to perform dose assessment calculations, shift operators who are qualified for the Emergency Coordinator function, and Shift Technical Advisers will receive awareness training on EPIP 2-18 by 12/31/92. Training will focus on data sources, general methodology and reasonableness of results.
 - EPIP 1-0 (Emergency Classification) will be revised to include derived high-range effluent trigger points corresponding to NUREG-0654 dose rate criteria for Site Area Emergency and General Emergency conditions. These revisions will be completed by 8/31/92.

2. Nuclear Emergency Response Plan (NERP)

The Inspection Report offers suggestions for improvements in the NERP which we will review and incorporate as appropriate. Some specific comments regarding the Inspection Report's treatment of the NERP are as follows:

- The Section 8 description of the EOF operations has served well in its detail of the facility and functional roles. We will review the net benefit of moving the section from one portion of the NERP to another.
- Full descriptions of ERO positions are provided in EPIP 5-7. We believed this to be an acceptable approach to minimize the size and verbiage of the Plan. We will more clearly cross-reference the NERP to EPIP 5-7. We will also review the NERP to assure that key command and control positions (i.e., Emergency Coordinator, EOF/Recovery Manager) are clearly and sufficiently described.
- The transfer of command and control to EOF is discussed in Section 4.2 of the NERP and is detailed in the EOF activation procedure (EPIP 3-1). The fact that the EOF may activate and delay assumption of command and



control is practiced during each major drill and exercise, and is well understood within the ERO. Nevertheless, we will further review the language contained in the NERP and clarify it as necessary.

Consistent with the desire to simplify and streamline our corrective action tracking and management, we recently transferred the tracking of EP improvements from the formerly employed Training Evaluation Action Reports (TEARS) system to the Nuclear Division-wide Commitment and Action Tracking Systems (CATS) system.

Other Inspection Report recommendations have been incorporated in Revision 10 of the NERP, or are under evaluation.

3. Emergency Facilities, Equipment, Instrumentation and Supplies:

A technical review of the means to verify TSC ventilation system operability is currently in progress. Specific instructions will be added to TSC activation procedures to ensure that positive pressure and proper damper position are verified upon start-up of the ventilation system. A microprocessor-based monitoring unit is installed and its use will be clearly addressed in TSC activation procedures.

The process used for equipment inventory and operability checks is under current review. We are seeking ways to assure that all checks and related documentation are completed on schedule. Although no systematic equipment performance problems have been in evidence, we are also working to upgrade record-keeping quality to allow for improved root cause analysis to address potential equipment performance problems.

4. Organization and Management Control:

We believe that sufficient personnel are qualified to support protracted operations in all key positions. However steps are underway to recruit additional ERO personnel for positions indicated in the Inspection Report. In addition, each position shown on the EPIP 5-4 qualification list will indicate those personnel qualified for only that position, and those who are also qualified for other positions. Our objective is to have a minimum of 3 persons qualified for each unique position.

We have also taken steps to transfer several administrative tasks from the EP staff to a supervised clerical staff member.



5. Training:

EPIP 5-4 has been revised to more clearly define the annual requalification requirement for Company personnel (i.e., every 12 months +/- 3 months). We are continuing to use innovative approaches in the general and specialized training provided to ERO members.

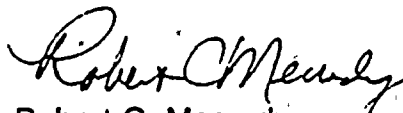
6. Independent Reviews and Audits:

We concur with the need for improved administrative controls and better centralized drill and exercise documentation. However, we take exception to NRC's statement that "program formality and consistency was thereby lacking." Literally hundreds of pages of controller and player comments are submitted, collated and reviewed following each major drill and exercise using detailed, pre-formatted evaluation forms. Additional comments and suggestions that interested players may desire to submit are also encouraged and reviewed, regardless of format or formality. We believe that NRC's characterization of the "informality" of our drill documentation based upon one or two non-standard notes to be unrepresentative of our program.

Overall, we recognize that program administrative and management improvement opportunities do exist, and we will engage our Quality Assurance staff to assist in pursuing those improvements wherever possible.

Thank you for the constructive suggestions provided in Inspection Report 91-28, and be assured of our continued attentiveness to all aspects of our Emergency Preparedness Program, and in particular to those areas you have noted. We welcome any further comments from your staff and encourage continued communications on all issues relative to our program.

Very truly yours,


Robert C. Mecredy

c: Sr. Resident Inspector
A. Johnson
E. McCabe