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 JOHNSON, A.R. Project Directorate I-3

SUBJECT: Lists summary of util positions re three facets of IPEEE, per
 util 911226 response to GL 88-20, Suppl 4 & 920921 response
 to GL 87-02, Suppl 1 re seismic events. Fire PRA will be
 performed using guidance in NUREG-1407, Section 4.1.

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November 3, 1992

U.S. Nuclear Regulatory Commission
Document Control Desk
Attn: Allen R. Johnson
Project Directorate I-3
Washington, D.C. 20555

Subject: Individual Plant Examinations for
External Events (IPEEE)
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

Ref.(a): Letter from R. C. Mecredy, RG&E, to A. R. Johnson, NRC,
Subject: IPEEE, 180-day Response to Generic Letter 88-20
Supplement 4, dated December 26, 1991

(b): Letter from R. C. Mecredy, RG&E, to A. R. Johnson, NRC,
Subject: Response to Generic Letter 87-02 Supplement 1
(SQUG) and Generic Letter 88-20 Supplement 4, (SEISMIC
EVENTS), dated September 21, 1992

(c): Letter from A. R. Johnson, NRC, to R. C. Mecredy, RG&E,
Subject: Review of Response to Generic Letter 88-20
Supplement No. 4 - Individual Plant Examinations for
External Events, dated June 30, 1992

(d): Letter from D. M. Crutchfield, NRC, to J. E. Maier, RG&E.
Subject: Integrated Plant Safety Assessment Report
(IPSAR), Section 4.5, Plant Flooding by Deer Creek, dated
August 19, 1983.

Dear Mr. Johnson:

In RG&E's letter of December 26, 1991 Reference (a), responding to Generic Letter 88-20, Supplement 4, we provided our approach to resolution of the issue of Individual Plant Examinations for External Events (IPEEE). Our response was divided into three categories: Internal Fires; Seismic; and High Winds, External Floods, and Transportation Accidents. Additional detail was requested by the NRC in Reference (c). A summary of our positions regarding these three facets of the IPEEE are provided below:

1. Internal Fires: As stated in Reference (a), we are planning on performing a fire PRA using the guidance of NUREG-1407, Section 4.1.

2. Seismic: A more detailed description regarding our seismic IPEEE plans was provided by letter dated September 21, 1992 Reference (b), in response to the NRC's June 30, 1992 request for additional information (Reference c). We described our

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plans for integrating our resolution of USI A-46 (SQUG) with the seismic IPEEE.

3. High Winds, External Floods and Transportation Accidents: In accordance with Section 5 of NUREG-1407, a progressive screening approach was performed for this part of the IPEEE analysis. This progressive screening was performed during the Systematic Evaluation Program (SEP) and consisted of performing a comparison of the design of Ginna Station against the criteria in the Standard Review Plan (NUREG-75/087). Within that assessment, it was determined that:

- a. for high winds, Ginna Station can withstand a 10^5 tornado within design limits, and a 10^6 tornado without structural failure. This is considered to meet Section 5.2.4 of NUREG-1407.
- b. for external flooding, a Probable Maximum Flood with a recurrence interval of 5×10^4 was used as the basis for modifications to Ginna Station. These modifications were judged to provide the necessary protection from this event, consistent with 10CFR50.109, as described in the NRC's Safety Evaluation Report of August 19, 1983, Reference (d). This is considered to meet Section 5.3 of NUREG-1407.
- c. for transportation accidents, the SEP Topic II-1.C SER concluded that the Standard Review Plan was met. This is considered to meet Section 5.2.3 of NUREG-1407.

Based on this progressive screening approach performed as part of the SEP, RG&E considers this portion of the IPEEE to be met, with one exception. In accordance with Section 5.2.3 of NUREG-1407, RG&E will perform a walkdown to assure that no potential plant vulnerabilities were excluded in the original design basis analysis. This walkdown/evaluation will be completed by May 22, 1995.

A copy of any of the Safety Evaluation Reports for the above-listed SEP topics is available for review by the NRC staff, if desired.

Very truly yours,


Robert C. Mecredy

GJW/262

xc: Mr. Allen R. Johnson (Mail Stop 14D1)
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Ginna Senior Resident Inspector