

ACCELERATED DOCUMENT DISTRIBUTION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9301220007 DOC. DATE: 93/01/12 NOTARIZED: NO DOCKET #
 FACIL: 50-244 Robert Emmet Ginna Nuclear Plant, Unit 1, Rochester G 05000244
 AUTH. NAME AUTHOR AFFILIATION
 MECREDY, R.C. Rochester Gas & Electric Corp.
 RECIP. NAME RECIPIENT AFFILIATION
 JOHNSON, A.R. Project Directorate I-3

SUBJECT: Submits results of review of NRC evaluation of util 920921
 response to GL 87-02, Suppl 1, "SQUG Resolution of USI A-46"
 & GL 88-20, Suppl 4 re seismic events. Requests that NRC
 promptly respond to resolution of GL 88-20, Suppl 4.

DISTRIBUTION CODE: A025D COPIES RECEIVED: LTR 1 ENCL 0 SIZE: 3
 TITLE: Seismic Qualification of Equipment in Operating Plants - A-46

NOTES: License Exp date in accordance with 10CFR2,2.109(9/19/72). 05000244

	RECIPIENT ID CODE/NAME	COPIES		RECIPIENT ID CODE/NAME	COPIES	
		LTTR	ENCL		LTTR	ENCL
	PD1-3 LA	2	2	PD1-3 PD	1	1
	JOHNSON, A	1	1			
INTERNAL:	NRR/DET CHEN, P	4	4	NRR/DET/ESGB	2	2
	NRR/DST/SELB	1	1	NRR/DST/SICB	1	1
	NRR/DST/SPLB	1	1	NRR/DST/SRXB	1	1
	NRR/PD1-3	1	1	OGC/HDS1	1	1
	<u>REG FILE</u> 01	1	1			
EXTERNAL:	NRC PDR	1	1			

Cont NO
1034043372

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK,
 ROOM P1-37 (EXT. 504-2065) TO ELIMINATE YOUR NAME FROM DISTRIBUTION
 LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 18 ENCL 180

1948-1949

1948-1949



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



ROBERT C. MECREDY
Vice President
Ginna Nuclear Production

January 12, 1993

TELEPHONE
AREA CODE 716 546-2700

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

Subject: Generic Letter 87-02, Supplement 1 (SQUG Resolution of
USI A-46) and Generic Letter 88-20, Supplement 4 (Seismic
Events)
R. E. Ginna Nuclear Power Plant
Docket No. 50-244

- Reference:
- (a) Letter from A.R. Johnson, NRC, to R.C. Mecredy, RG&E,
Subject: *Evaluation of Ginna Nuclear Power Plant,
120-Day Response to Supplement No. 1 to Generic
Letter 87-02 (TAC No. M69449), dated November 30,
1992.*
 - (b) Letter from R.C. Mecredy, RG&E, to A.R. Johnson, NRC,
Subject: *Response to Generic Letter 87-02, Supplement
1 (SQUG Resolution of USI A-46) and Generic Letter
88-20, Supplement 4 (Seismic Events), dated September
21, 1992.*
 - (c) Letter from N.P. Smith, SQUG, to J.G. Partlow, NRC,
Subject: *SQUG Position on GIP Implementation
Guidance, dated December 23, 1992.*
 - (d) Letter from J.G. Partlow, NRC, to N.P. Smith, SQUG,
NRC Response to Seismic Qualification Utility Group
(SQUG), dated October 2, 1992.
 - (e) Letter from D.M. Crutchfield, NRC, to J.E. Maier,
RG&E, *SEP Safety Topics III-6, Seismic Design
Consideration and III-11, Component Integrity - Ginna
Nuclear Power Plant, dated January 29, 1982.*
 - (f) Letter from D.M. Crutchfield, NRC, to J.E. Maier,
RG&E, *Status of SEP Topics III-1, III-6, III-8.A, and
V-7 - R.E. Ginna, dated February 17, 1982.*

Dear Mr. Johnson:

Rochester Gas and Electric has completed its review of the NRC's evaluation (Reference a) of our response (Reference b) to Generic Letter 87-02, Supplement 1 and Generic Letter 88-20, Supplement 4 (Seismic Events). The NRC Staff's evaluation accepted, in general, RG&E's response, but based their acceptance in several areas on interpretations by the staff. RG&E would like to provide additional clarification on several of these topics.

9301220007 930112
PDR ADDCK 05000244
P PDR

Cent No
P034043372

AD25
10

1013

First, the NRC Staff stated that it was unclear whether RG&E would fully implement all provisions of the guidance sections of the Generic Implementation Procedure (GIP) and, if not, questioned the process that would be used for notifying the Staff of deviations. RG&E's actions will be in accordance with Part I, Section 1.3 of the GIP, Revision 2 (as corrected February 14, 1992), which was accepted by the Staff in its SSER No. 2 on the GIP, dated May 22, 1992. This position was also forwarded to the NRC separately by the SQUG (Reference c).

Second, the NRC Staff's evaluation requested that RG&E use Enclosure 2 of their evaluation (Reference d) instead of the August 21, 1992 SQUG letter as guidance for implementing GIP-2. After review of this NRC letter to SQUG, RG&E agrees to observe the interpretations and positions which are provided.

Third, in their evaluation, the staff discussed a concern with respect to RG&E's revising the licensing basis of Ginna Station to use the GIP methodology for verifying the seismic adequacy of applicable electrical and mechanical equipment prior to a plant-specific SER resolving USI A-46. This concern was based on the fact that RG&E did not commit to the guidance portions of the GIP. However, since RG&E will notify the NRC of any deviations from the guidance sections consistent with an NRC approved document (i.e., GIP), we maintain that it is acceptable to revise the licensing basis using the evaluation process within 10 CFR 50.59 prior to receipt of a plant-specific SER related to USI A-46.

Fourth, the staff's evaluation accepted the use of the options provided in the GIP for defining seismic demand and in-structure response spectra (IRS) since Ginna was a Category 2 plant. However, the staff added that "if more than one set of IRS appear in the licensing basis documents, the more conservative set of spectra must be used to qualify for the definition of 'conservative, design' IRS for the resolution of USI A-46 issues at Ginna". RG&E does not agree with this position. There are several IRS contained within licensing basis documents for Ginna Station as a result of previous industry bulletins and programs. As an alternative to performing an extensive review of these IRS, RG&E plans to use the spectra developed by the Seismic Piping Upgrade Program (Engineering Work Request No. 2512), which was initiated as a result of IE Bulletins 79-02 and 79-14, and the Systematic Evaluation Program (SEP). The Seismic Upgrade Program evaluated safety-related piping against current criteria (e.g., R.G. 1.60, R.G. 1.61, Standard Review Plan) and was reviewed and accepted by the NRC (References e and f). The IRS developed by EWR No. 2512 have been subsequently used at Ginna Station for plant modifications. RG&E therefore maintains that the IRS developed by EWR No. 2512 meet the definition of "conservative design" spectra as provided in Section 4.2.4 of the GIP and associated SSER No. 2. RG&E will notify the NRC if any alternative IRS are used in support of the USI A-46 resolution.

Finally, the evaluation by the staff did not address the proposed actions in our response (Reference b) to Generic Letter 88-20, Supplement 4 (Seismic Events). The approach that we proposed is substantially dependent upon the USI A-46 program for Ginna, and as such, may affect the schedule for implementing the GIP if changes are required. Since RG&E plans to contract outside resources in order to assist in the resolution of USI A-46, and with walkdowns scheduled to begin during the next refueling outage beginning in March of 1993, we request that the NRC promptly respond (within 45 days of receipt of this letter if possible) to the proposed resolution of GL 88-20, Supplement 4 for Ginna Station. The absence of your response to our proposed approach to GL 88-20, Supplement 4 (Seismic Events) could result in undesirable delays and major adjustments to our resource allocation for future outages.

Very truly yours,


Robert C. Mecredy

MDF/496

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

