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SUBJECT: Comments on proposed suppl 5 to GL 88-20 re reduction in seismic hazard to majority of US NPP.

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ROBERT C. MECREDY
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RULES REVIEW & DIR. BR.
USNRC

February 28, 1995

(4)

Chief, Rules Review and Directive Branch
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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60FR5734
01/30/95

Subject: Comments Proposed Supplement 5 to GL 88-20
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

John Chen

This letter provides comments in response to the Federal Register Notice (Vol. 60 Fed. Reg. 5734 - January 30, 1995 Notice of Opportunity of Public Comment) regarding this subject. RG&E is pleased that the NRC has acknowledged the significant reduction in seismic hazard to the majority of U.S. nuclear power plants, including Ginna Station, due to the revised LLNL mean seismic hazard curves. This information was published in Information Notice 94-32, ERI/NRC 94-502, ERI/NRC 94-504, and comments to this effect were made at the public workshop held on October 21, 1994.

We are disappointed, however, by the apparent lack of meaningful response by the NRC to this significant new information. Simply removing the review of soil-structure interaction and reactor vessel internals from the scope of IPEEE, while an important improvement, does not do justice to the comprehensive insights developed in this area by industry and seismic experts.

RG&E agrees with the comments made by NEI at the October 21, 1994 workshop that, in order to resolve the seismic issue for the majority of plants, emphasis should be placed on a comprehensive seismic walkdown and review by a team of seismic and systems experts. Insight gained from this experience will be factored into utility decision-making in defining the extent, if any, of resultant plant changes. Because the generic letter does not establish any legally binding requirements to go beyond the regulations, and because we feel that no important additional insights will be gained from a seismic review above SSE levels, RG&E asserts that this walkdown/review should be performed at the design basis SSE for the site (0.2 g for Ginna), thus also resulting in the resolution of USI A-46 in an efficient manner.

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As suggested in the Federal Register Notice, RG&E will be informing the NRC within 60 days of the date of the published generic letter, of our intent to modify our IPEEE submittal schedule. The detailed methodology we propose to use to implement our IPEEE commitments will be described at that time.

Very truly yours,


Robert C. Mecredy

GJW/371

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