

CATEGORY 1

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9802120158 DOC. DATE: 98/02/03 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
 VISSING, G.S.

SUBJECT: Requests one-time exemption from requirements of
 10CFR50.71(e)(4) to file within 6 months of plant last
 refueling outage & obtain approval to submit next FSAR
 update by 981216.

DISTRIBUTION CODE: A001D COPIES RECEIVED: LTR 1 ENCL 0 SIZE: 4
 TITLE: OR Submittal: General Distribution

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

RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
PD1-1 LA	1 1	PD1-1 PD	1 1
VISSING, G.	1 1		
INTERNAL: <u>FILE CENTER</u> 01	1 1	NRR/DE/ECGB/A	1 1
NRR/DE/EMCB	1 1	NRR/DRCH/HICB	1 1
NRR/DSSA/SPLB	1 1	NRR/DSSA/SRXB	1 1
NUDOCS-ABSTRACT	1 1	OGC/HDS3	1 0
EXTERNAL: NOAC	1 1	NRC PDR	1 1

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE. TO HAVE YOUR NAME OR ORGANIZATION REMOVED FROM DISTRIBUTION LISTS
 OR REDUCE THE NUMBER OF COPIES RECEIVED BY YOU OR YOUR ORGANIZATION, CONTACT THE DOCUMENT CONTROL
 DESK (DCD) ON EXTENSION 415-2083

TOTAL NUMBER OF COPIES REQUIRED: LTTR 13 ENCL 4

C
A
T
E
G
O
R
Y

1

D
O
C
U
M
E
N
T



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



AREA CODE 716 546-2700

ROBERT C. MECREDY
Vice President
Nuclear Operations

February 3, 1998

U.S. Nuclear Regulatory Commission
Document Control Desk
Attn: Guy S. Vissing
Project Directorate I-1
Washington, DC 20555

SUBJECT: Request for Exemption to 10CFR50.71(e)(4),
10CFR50.71(e)(1), and 10CFR50.4(b)(6) Requirements
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Vissing,

10CFR50.71(e)(4) requires that Rochester Gas & Electric (RG&E) update the Ginna Final Safety Analysis Report (FSAR) periodically and file revisions "annually or 6 months after each refueling outage provided the interval between successive updates does not exceed 24 months. The purpose of this letter is to request a one-time exemption from the requirements of 10CFR50.71(e)(4) to file within 6 months of Ginna's last refueling outage and to obtain approval to submit the next FSAR update by 12/16/98, i.e., within 24 months of the last submittal. [RG&E would include changes "up to a maximum of 6 months prior to the date of filing" (12/16/98), as required by 10CFR50.71(e)(4).]

10CFR50.71(e)(1) requires that licensees submit revisions "on a replacement page basis ... accompanied by a list which identifies the current pages of the FSAR following page replacement." This letter requests an on-going exemption from the requirements of 10CFR50.71(e)(1) in that future revisions to the FSAR will be controlled on an electronic file basis; the entire file and all automatically numbered pages within the file will have the same revision number.

10CFR50.4(b)(6) requires that "the signed original and 10 copies" be submitted to the NRC Document Control Desk. This letter requests an on-going exemption from the requirements of 10CFR50.4(b)(6) by submitting as few paper copies as possible. RG&E proposes submitting the signed original and one hard copy along with nine electronic copies, each with a reusable browser, instead of the "signed original and 10 copies."

9802120158 980203
PDR ADDOCK 05000244
PDR



Basis for Request

RG&E is working with the NRC to convert both its Technical Specifications and FSAR to Standard Generalized Markup Language (SGML) with the goals of:

- distributing these documents to their users in searchable electronic book format (including figures, equations, tables, etc.),
- maintaining them as living documents with as close to real-time changes as possible (approximately quarterly), and
- distributing those changes instantly via update of the electronic files.

RG&E's conversion to SGML serves the NRC's interests, because it continues the NRC's pilot program to have utilities submit document changes electronically. RG&E's SGML version will be delayed without this exemption, because resources will have to be diverted back to producing the submittal in the traditional way.

The following dates are pertinent regarding this FSAR exemption request:

1. RG&E's last FSAR submittals were 7/22/96 and 12/16/96; thus, 12/16/98 is the end of the 24 month period from the date of the last FSAR submittal.
2. RG&E's next FSAR update is due 5/21/98 (6 months after the last refueling outage).

Determination of Special Circumstances

10CFR50.12, "Specific Exemptions," allows the Commission to consider granting an exemption when special circumstances are present. This exemption falls under the special circumstances provided for in 10CFR50.12(a)(2)(iv), which states that an exemption may be granted if it "would result in benefit to the public health and safety that compensates for any decrease in safety that may result from the grant of the exemption."

The benefit to the public health and safety is that the FSAR would become more accessible in the SGML format, encouraging better research by RG&E and NRC users who are trying to understand the plant's licensing and design bases. This future increased accessibility compensates for the delay in FSAR updating which will result from the granting of the exemption.

It is requested that this exemption be reviewed and approved by the NRC Staff as soon as possible, and that notification as to the NRC's decision be received by RG&E no later than March 27, 1998. This will allow RG&E sufficient time to focus its efforts on a traditional submittal, if the exemption is not granted.

It should be noted that:

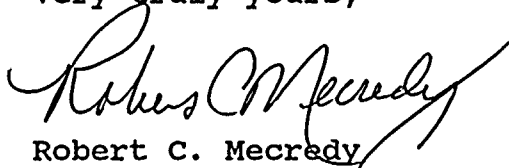
- There is precedence for the period of two years between FSAR submittals in that it is consistent with plants on a two year refueling cycle, and
- RG&E will be able to include the first results from its UFSAR verification project in a delayed submittal. (see RG&E correspondence dated 2/7/97, "Response to NRC Request for Information Pursuant to 10CFR50.54(f) Regarding Adequacy and Availability of Design Bases Information")

Please also note that the granting of an exemption will supersede the following two statements made by RG&E to the NRC:

- RG&E correspondence dated 11/25/97, "60 Day Response to NRC Inspection Report No. 50-244/97-201, A/E Inspection." This correspondence stated that RG&E would correct several discrepancies in the FSAR identified during the A/E inspection "in the next scheduled UFSAR revision to be issued on or before May 21, 1998."
- RG&E UFSAR submittal, Revision 13, dated 12/16/96. This correspondence stated that RG&E was modifying its annual submittal interval to 18 months and within 6 months after each refueling outage.

Please contact Mr. George Wrobel, Manager Nuclear Safety and Licensing, at (716)724-8070, if you have any questions related to this request.

Very truly yours,



Robert C. Mecredy

EJF\494

xc: Mr. Guy Vissing (Mail Stop 14B2)
Project Directorate I-1
Washington, D.C. 20555

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

Ginna Senior Resident Inspector

