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SUBJECT: Provides clarification for several statements made in NRC
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April 24, 1998

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

Subject: Clarification of Statements Made in NRC Inspection Report
50-244/97-12, dated February 9, 1998

- Ref. (1) NRC Integrated Inspection Report 50-244/97-12 and Notice
of Violation, dated February 9, 1998
- (2) Letter from R.E. Smith, RG&E, to NRC, Subject: Response
to NRC Request for Information Pursuant to 10CFR50.54(f)
Regarding Adequacy and Availability of Design Information
R.E. Ginna Nuclear Power Plant, dated February 7, 1997
- (3) Letter from R.C. Mecredy, RG&E, to G.S. Vissing, NRC,
Subject: Update to Response to NRC Request for
Information Pursuant to 10CFR50.54(f) Regarding Adequacy
and Availability of Design Basis Information R.E. Ginna
Nuclear Power Plant, dated September 30, 1997
- (4) Letter from R.C. Mecredy, RG&E, to NRC, Subject:
Submittal of Security Plan revision M, dated July 24,
1997

Dear Mr. Vissing:

This letter is to provide clarification for several statements made
in NRC Inspection Report 50-244/97-12.

- 1) Statement: Section E1.3 Licensing and Design Basis Activities,
page 14 states "The UFSAR verification project was scheduled to
proceed in parallel with the validation of all other design
basis source documents so that an electronic link of these
source documents to a living UFSAR could be accomplished by
October 1998 for use during the DBD project."

Clarification: The UFSAR verification project and design basis
documentation project are not proceeding in parallel. This was
explained in our letter dated September 30, 1997 (Reference
3). The UFSAR verification and design basis documentation
projects use some of the same resources; therefore, it was
decided to concentrate on the UFSAR verification project until

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October 18, 1998 and then shift additional resources to the design basis documentation project. The links from the UFSAR to the source documents will not be completed until December 2001 as explained in Reference 3.

- 2) Statement: Section E1.3 Licensing and Design Basis Activities, page 14 states "With the completion of the service water safety system functional inspection (SSFI) and the NRC design team inspection of Ginna, RG&E noted in the updated response letter of September 30, 1997, that they had completed the commitment to perform two SSFIs in 1997. RG&E indicated that they would perform a SSFI of the AFW system in 1998."

Clarification: RG&E has determined we should concentrate the majority of our resources on the Design Basis Documentation (DBD) and UFSAR verification projects described above, as well as closeout of Motor-Operated Valve (GL89-10) and Service Water (GL89-13) issues. Therefore, RG&E is not currently intending to perform an AFW system SSFI in 1998.

- 3) Statement: Section E8.1 (Closed) Violation 50-244/96-06-02: Inadequate Safety Evaluation Regarding Stroke Time Change for MOV-4616, page 17 states "The inspector noted that the licensee work in compiling a document of all variables used in the UFSAR Accident Analysis chapter was partially complete and was scheduled for completion by March 1, 1998, according to R05598 in the licensee's Commitment and Action Tracking System (CATS)..."

Clarification: The scope of the compilation of the major variables used in the UFSAR Accident Analysis chapter has been expanded to include additional items, such as accident and analysis assumptions, valve stroke times and setpoints. This effort is currently scheduled to be completed by June 30, 1998.

- 4) Statement: Section E8.2 (Updated Unresolved Item 50-244/96-06-04: Service Water System Reliability Optimization Program (SWSROP) Issues, page 18 states "In addition to issues related to heat exchanger performance testing and revision of the SWSROP, comments were made regarding the need to update the SW system hydraulic flow model since it under predicted flows in some cases. The licensee indicated that this work was being done in-house and was scheduled for completion by the end of January 1998."

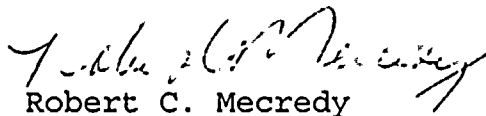
Clarification: Additional testing has been performed to better predict flows to the CRFC motor coolers. With the inclusion of this data, the SW system Hydraulic model is expected to be refined by June 16, 1998.

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- 5) Statement: Section S3 Security and Safeguards Procedures and Documentation, page 23 states "The inspectors verified that selected changes to the Plan, associated with the vehicle barrier system (VBS), as implemented, did not decrease the effectiveness of the Plan. Discussions with the licensee indicated that the plan was currently being reviewed and a plan revision would be submitted in accordance with the provisions of 10CFR 50.54(p) in the near future."

Clarification: RG&E submitted a Security Plan revision M on July 24, 1997 (Reference 4) which provided enhancement to the VBS. Also, RG&E submitted Security Plan revision N on January 15, 1998 although this revision was not related to the VBS.

Very truly yours,


Robert C. Mecredy

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