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 AUTH.NAME:      AUTHOR AFFILIATION  
 MECREDY, R.C.      Rochester Gas & Electric Corp.  
 RECIP.NAME      RECIPIENT AFFILIATION  
 VISSING, G.S.

SUBJECT: Informs that util has completed implementation of severe accident mgt program IAW NEI 91-04, Rev 1, "Severe Accident Issue Closure Guidelines," Section 5. Implementation of program satisfies commitment discussed in util 950324 ltr.

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ROBERT C. MECREDY  
Vice President  
Nuclear Operations

December 18, 1998


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

Subject: Severe Accident Issue Closure

Dear Mr. Vissing:

The purpose of this letter is to inform you that Rochester Gas and Electric Corporation has completed implementation of a Severe Accident Management Program in accordance with NEI 91-04, Revision 1, Severe Accident Issue Closure Guidelines, Section 5. The process used to implement our SAMG Program is outlined in Attachment A. Implementation of this program satisfies our commitment to address the Severe Accident Management issue by December 31, 1998, as discussed in our letter to NRC, dated March, 24, 1995.

Very truly yours,

  
Robert C. Mecredy

Attachment

xc: Mr. Guy S. Vissing (Mail Stop 14B2)  
Project Directorate I-1  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

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

U.S. NRC Ginna Senior Resident Inspector

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## **ATTACHMENT 1**

### **OUTLINE Ginna Station SAMG Implementation Process**

Based on initial evaluation of the IPE, RG&E made the decision to pursue implementation of a Severe Accident Mitigation Guideline (SAMG) approach to closure of the Severe Accident issue. RG&E adopted the Westinghouse Owners Group (WOG) generic SAMG's as a basis for Ginna's specific guidelines.

Volian Enterprises was contracted to develop plant specific guidelines using the WOG generic guidelines as a template. Volian was chosen due to their experience in the Emergency Operating Procedure (EOP) area and their procedure management software capability. The Volian work scope was as follows:

- Define Scope and Acquire Reference Material
- Determine Applicable SAMG Strategies
- Develop Ginna Equipment Capability Tables
- Develop Setpoints and Computational Aids
- Prepare Ginna SAMGs
- Identify and Recommend Changes Required to Other Procedures

A SAMG implementation team was formed at Ginna, consisting of personnel from Nuclear Safety and Licensing, Emergency Preparedness, Operations and Training. The team provided the following technical and administrative support:

- Maintained extensive interface with Volian during the development of the SAMGs. Plant specific information was provided as required. Ginna personnel also performed extensive review of the Volian output as it became available, providing significant feedback which was incorporated into the guidelines.
- The Ginna Station SAMG Project Coordinator and the Director of Emergency Preparedness traveled to Calvert Cliffs to observe a SAMG Table Top Exercise.
- Performed verification of Setpoints and Computational Aids and returned comments to Volian.
- Developed three new procedures to administer the SAMG Program:
  - IP-EPP-1, Severe Accident Management Guidelines Writers Guide
  - IP-EPP-2, Severe Accident Management Guidelines Users Guide
  - IP-EPP-3, Control of Severe Accident Management Guidelines (SAMG)

## ATTACHMENT 1

- Developed and drafted the necessary changes to Emergency Plan Implementation Procedures (EPIPs) to describe responsibilities and interface with the Emergency Plan.
- Developed the EOP procedure changes providing transition from EOPs to SAMGs
- Prepared Safety Evaluation SEV-1118 to address implementation and the procedure changes necessary to administrate the program.

The Project team also developed and implemented a training strategy as follows:

- Acquired nine SAMG Scenario templates from Westinghouse to use as a guide in preparing training and validation scenarios.
- Contracted Volian to provide procedures management software (VEPROMS) to Emergency Preparedness and clerical personnel.
- Provided classroom training for Decision Makers, Evaluators, and Implementors. The curriculum was developed from the WOG SAMG training guidelines. Feedback from the training sessions was resolved and incorporated in the guidelines.
- Held six Table Top training/validation sessions. Each session was four hours in length and consisted of one or two scenarios, depending on scenario length. Each member of the Technical Support Center (TSC) SAMG staff attended two of these sessions. Feedback from these sessions was again evaluated and included in the program.
- Conducted a SAMG drill utilizing the Plant Simulator consistent with it's capabilities. The TSC was manned providing maintenance and RP interface with the SAMG players. Feedback was again incorporated.
- The Systematic Approach to Training is being utilized to ensure appropriate SAMG recurring training will be provided to support the program. The SAMG training will be administered under the Emergency Preparedness Program.

A Self-Assessment of the program was performed by the Ginna Station Operational Assessment group, as recommended in NEI 91-04, section 5.3.6. The results of the assessment indicated that the SAMG Program was successfully implemented and integrated into the emergency response capability without adversely affecting emergency response.

The Ginna Station Severe Accident Management Program was formally implemented on December 14, 1998.

