



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

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October 6, 1982

Mr. Ronald C. Haynes, Regional Administrator
U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

Dear Mr. Haynes:

The purpose of this letter is to provide you with our comments and opinions in your systematic assessment of the licensee performance report as it applied to Ginna Station dated September 7, 1982.

My staff and myself appreciated the opportunity to meet with you and discuss Rochester Gas and Electric's operations and licensing efforts over the assessment period.

The following comments are offered regarding your overall SALP efforts:

Receipt of the report in advance of our meeting was indeed helpful. With proper time to review and assess your report, I believe a meaningful exchange of information and common concerns was possible. I hope this practice will continue in the future.

The change in your format is appreciated. The category definitions indeed make sense and provide clear indications in the event increased management attention is required.

Overall, there was a noticeable improvement in the usefulness of your program to a licensee interested in improving his performance.

Regarding your report on the appraisal of Ginna's performance, the following is offered:

In general, we have no argument with your assessment. There are some points that we wish to clarify or expand as we have discussed in our meeting.

DATE October 6, 1982

TO Mr. Ronald C. Haynes, Regional Administrator

The areas that we were aware of that needed attention were indeed being addressed. Areas brought to our attention by the Senior Resident Inspector were agreed to be pertinent to safety and were pursued in a timely fashion.

In the area of modification implementation and training we agree that more attention is needed in this area. I have directed RG&E's Engineering Department and Ginna Station management to pursue a joint effort to determine resources necessary to ensure plant safety is indeed improved through the implementation of modifications.

Flexibility with commitment dates would be helpful once full scope of the project has been determined. We will make every effort to continue our performance at a level equal to or higher than we achieved this past year.

We have one concern in the Health Physics dose assessment which we wish to address:

RG&E would like to comment on the portion of the radiological controls report pertaining to the offsite releases during the steam generator tube rupture incident.

The first concern involves the technical aspects of this section. Although we are not certain what purpose the statement concerning the quantity of releases serves in this report as it is written, it is not correct.

In NUREG-0909, it was indicated that the Ginna Technical Specifications did not apply during the tube rupture event. Also, the Tech Specs for noble gas release are for an instantaneous release rate, not for an average over three hours. Therefore, the references to Tech Spec limits should be removed from this report.

The statement preceding this makes reference to "offsite" releases. Much of the difficulty with obtaining total curie release estimates stemmed from the fact that the majority of the release from the main steam relief valve was deposited within the site boundary, in fact, primarily within the site protected area. The offsite portion of the release was quantified very rapidly by direct measurements by the monitoring teams, environmental air sampling and environmental dosimetry.

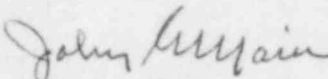
The other concern we would like to express is that although the offsite dose assessment was performed rapidly and accurately, no credit is given for this in the evaluation. The main concern of the health physics group was to determine what the dose rates were in the environment.

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TO Mr. Ronald C. Haynes, Regional Administrator

The quantification of the curies released was hampered by the inability to rapidly determine the volume released through the safety valve. This had no effect on accurate assessment offsite dose rates which were rapidly obtained by direct surveys and air samples obtained both on and off site. If the total curies released had been known prior to direct measurement, the calculated offsite dose rates would have been greatly in error since most of the activity was deposited within the site restricted area.

Very truly yours,


John E. Maier