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December 29, 1978

Mr. Eldon J. Brunner, Chief
Reactor Operations and Nuclear
Support Branch
U. S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

Subject: IE Inspection No. 50-244/78-24
R. E. Ginna Nuclear Power Plant, Unit #1
Docket No. 50-244

Dear Mr. Brunner:

This letter is in response to your December 6, 1978 letter received December 11, 1978, concerning the inspection conducted at Ginna Station, Corporate Offices and the Andrews St. Building on November 13-16 by Messrs. Markowski, Napuda and Kehoe of your office. According to your letter, it appeared that one of our activities was not conducted in full compliance with NRC requirements, as quoted below. This letter contains information in response to this item.

"10 CFR 50, Appendix B, Criterion XVII states in part 'Consistent with applicable regulatory requirements, the applicant shall establish requirements concerning record retention, such as duration, location, and assigned responsibility.' Section 1 of Supplement IV, Revision 3, to the FSAR (the approved QA Program) states in part, 'The program conforms to the following AEC Regulatory Guides and ANSI Standards...Regulatory Guide 1.88, 'Collection, Storage and Maintenance of Nuclear Power Plant Records'...' Section 17 further states in part, 'The records which fall within quality assurance record requirements include those records required by Section 6.10 of the Technical Specifications, the quality assurance program... All records associated with the operation... of... systems, and components covered by the quality assurance program are included.' Regulatory Guide 1.88 endorses ANSI N45.2.9-1974, 'Requirements for Collection, Storage, and Maintenance of Quality Assurance Records for Nuclear Power Plants.' Paragraph 5.6 of this standard describes the physical requirements for a single record storage facility."

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"Contrary to the above, as of November 16, 1978, the following single type records were stored in the indicated locations which did not meet the described single record storage facility physical feature requirements.

- Original radiographs of safety related systems such as Reactor Coolant, Safety Injection and Chemical-Volume Control, dating to 1968, stored in cardboard filing boxes (Nos. 51, 52, 53, 57, and 58) at the Andrews Building.
- Operations Recorder Charts (no copies/duplicates available) stored in steel filing cabinets in a vacant office at the station Warehouse Building."

Since the inspection the radiographs have been removed from the cardboard filing boxes and placed in fire rated (Class 350-1 hr) cabinets. Fire rated cabinets (Class 150-1 hr), better suited for the protection of radiographs, have been purchased and will be utilized for the storage of the radiographs upon their receipt in early January. The radiograph cabinets will be located at the Jefferson Road Record Vault which has a four hour fire rating and is equipped with temperature and humidity control. Upon completion of their relocation by mid-January, the radiographs will be afforded the necessary protection for a single record storage facility having physical requirements comparable to those specified in paragraphs 5.6 of ANSI N45.2.9-1974.

Due to the space limitation at the Jefferson Road Record Vault, a new record storage room is being designed and constructed to accommodate the remaining nonduplicate records. This new storage room will meet the physical requirements for a single records storage facility prescribed by ANSI Standard N45.2.9 and/or suitable fire protection alternatives provided by NRC Regulatory Guide 1.88. Pending completion of the new storage room, the fire rated (Class 350-1 hr) filing cabinets which contain the Operations Recorder Charts are being transferred from the Warehouse building to a vacant room at the Andrews St. facility. The vacant room is both more suitable than the warehouse location and remote from the existing storage for duplicate records. This interim storage location is in a fire resistive reinforced concrete building, has a sprinkler system and is free of combustibles other than the protected records. The surrounding area has been recently vacated, contains a minimum of combustibles and is also protected by a sprinkler system. With the exception of meeting the four hour fire rating, the interim storage location has the features essential for the protection of the records from possible destruction by causes such as fire, flooding, tornadoes, insects, rodents and from possible deterioration by a combination of extreme variations in temperature and humidity. Completion and occupancy of the new four hour records storage room is expected by June 1980.

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Corrective steps being taken to avoid further items of noncompliance are threefold:

1. Clarification has been provided in the QA Manual and will be provided in the Ginna Procedure QC1701 of the likelihood that some records are unable to be duplicated and the preferred requirements and location for their storage.
2. Ginna and Engineering records processing personnel will be reindoctrinated in record storage and preservation requirements.
3. Ginna Station records personnel have initiated an investigation to determine the existence of additional records which are not presently duplicated and which will require processing similar to the recorder charts. In addition, this investigation will determine if all required operating records are being processed for record retention.

Completion of items (1) and (2) above is expected by February 28, 1979. Completion of item (3) is expected by June 30, 1979. As indicated earlier, June 1980 is the expected date when full compliance will be achieved for the storage of all nonduplicate records.

The inspection report contains no information that is considered proprietary.

Very truly yours,



L. D. White, Jr.

