



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

LEON D. WHITE, JR.
VICE PRESIDENT

TELEPHONE
AREA CODE 716 546-2700



August 28, 1979

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. 50-244/79-08
R. E. Ginna Nuclear Power Plant, Unit #1
Docket No. 50-244

Dear Mr. Brunner:

This letter is in response to your August 7, 1979 letter received August 9, 1979 concerning the inspection conducted at Ginna Station May 1-18, 1979 by Mr. Beckman of your office. Your letter stated that it appeared that two of our activities were not conducted in full compliance with NRC requirements, as quoted below. This letter contains information in response to these items.

ITEM A.

"10 CFR 50 Appendix B, Criterion XI Test Control, states, in part, '....test results shall be....evaluated to assure that test requirements have been satisfied.' The Ginna Station Quality Assurance Manual, Section 11, Test Control, Revision 6, Paragraph 3.6.1 states, in part, 'Additional control procedures shall be instituted, as necessary, to assure timely....evaluation of test results.' Plant Procedure A-1104, Ginna Station Technical Specification Surveillance Program, Revision 0, Section 3.3, states, in part, 'The Results and Test Engineer, or designated assistant, shall be responsible for reviewing and evaluating the accuracy of all completed Periodic Tests....'

Contrary to the above, on May 9-10, 1979, it was determined that the following Periodic Tests were not properly reviewed in that:

- PT-12.2, Emergency Diesel 1B, Revision 10, performed on April 12, 1979, included unacceptable data for engine cooling water pressure

CCP

7910150 063

1-2

6-1



1



DATE - August 28, 1979

TO Mr. Eldon J. Brunner, Chief

which was not identified during post performance procedure review;
and

PT 16, Auxiliary Feedwater Systems Revision 19, was performed on April 25, 1979 but the test results did not receive timely evaluation in that the required data review and approval was not conducted until May 10, 1979 when the oversight was identified during this inspection and after approximately one half of the required surveillance test interval had elapsed."

RESPONSE:

The Results and Test Supervisor reviewed a portion of the data gathered on April 12, 1979, and, finding an obvious error, he immediately sent it back to the involved shift personnel for correction. When he later received the corrected procedure, he erroneously considered the review of the data complete and omitted review of the error noted by the inspector. Immediately after discovery of the unacceptable data a test was performed to ensure the "B" Emergency Diesel Generator was operable. All parameters were found to be acceptable. Proper review of completed test procedures has been discussed with the Results and Test Supervisor.

The test procedure performed on April 25, 1979 was not reviewed until May 10, 1979 as it did not receive priority attention in the press of increased work load and usage of personnel in task force work in connection with the TMI issue. This condition has been relieved as the Results and Test Group has recently gained two additional employees. Timely review will be aided by using a special provision for receipt of newly completed test procedures.

ITEM B.

"T.S. 6.8.1 states, in part, 'Written procedures shall be established, implemented and maintained covering the activities referenced below:
a) the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, November 1971....'

Regulatory Guide 1.33, Appendix A recommends, in part, that the following safety related activities be covered by written procedures: 'A.3 Equipment Control (e.g. locking and tagging)' and procedures for Startup, Operation and Shutdown of Safety Related PWR Systems, including 'C.5 Emergency Core Cooling Systems.'

Contrary to the above, on May 3, 1979, it was determined that Reactor Plant Systems Operations Procedure S-16A, Safety Injection System Alignment,

6-11-54



DATE August 28, 1979

TO Mr. Eldon J. Brunner, Chief

Revision 14, was not properly established, implemented nor maintained in that it failed to provide instructions for proper positioning of manual valve V-787E, Safety Injection Loop A Cold Leg Injection Throttle Valve. Furthermore, Valve 878E was found to be locked open but was not included in the locked valve list of A-52.2, Control of Locked Valves, Revision 24, as required by Section 3.4 of that procedure.

RESPONSE:

Investigation into the cause of this condition has found that in March 1971, when Valve 878E was installed as part of a modification, there were not sufficient Quality Assurance controls in existence to ensure that flow drawings and plant procedures were revised to reflect the modified or as-built configuration. Although RG&E flow drawing was revised to show Valve 878E, S-16A and A-52.2 were not revised.

To correct this situation, S-16A and A-52.2 have been revised to require Valve 878E to be locked open during operation. To preclude recurrence, sufficient QA/Administrative controls have been satisfactorily demonstrated to be in effect to ensure timely revision of flow drawings and operating procedures to reflect modified or as-built conditions following station modifications.

The inspection report contains no information that is considered proprietary.

Very truly yours,

L. D. White, Jr.

L. D. White, Jr.

Handwritten marks and scribbles at the top right corner.

