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LEON D. WHITE, JR.
VICE PRESIDENT

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December 20, 1979

Mr. Robert T. Carlson, Chief
Reactor Construction and Engineering
Support Branch
U. S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

Subject: IE Inspection No. 50-244/79-16
R. E. Ginna Nuclear Power Plant, Unit #1
Docket No. 50-244

Dear Mr. Carlson:

This letter is in response to your November 27, 1979 letter received November 30, 1979 concerning the inspection conducted at Ginna Station October 23-26, 1979 by Mr. Koltay 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. "Technical Specifications Section 6.8.1 states in part, that: 'Written procedures shall be established, implemented and maintained covering... Fire Protection Program implementation.'

Station Procedure A-54.3 'Open Flame Welding and Grinding Permit,' Revision 12, dated 6/27/79, paragraph 3.4, which states in part: 'The work area will be inspected by a foreman or supervisor...he will insure that...all movable combustible material...within a thirty-five (35) foot radius of the...welding...work has been removed...All immovable combustible material...within a thirty-five (35) foot radius has been... protected by...flame proof covers....'

Contrary to the above, on October 25, 1979, a welding operation authorized by welding permit No. 8002 was observed to be conducted within five feet of combustible materials, without the benefit of flameproof covers, and within twenty feet of an uncovered movable drum of oil."

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RESPONSE

The combustible material referred to was in the process of being removed from a seismic gap between buildings as part of the fire protection upgrading program. Following the inspector's tour all proposed work involving welding in the area was held up by the Fire Protection and Safety Coordinator until completion of this removal process.

The inspection report should be corrected in that the "uncovered movable drum of oil" was actually a drip pan for the turbine driven auxiliary feedwater pump located on the other side of an 8½ foot high concrete barrier partition. The pan, made from part of an oil drum, could hold as much as fifteen gallons of fluid. As a result of the inspection, it was emptied, and found to contain about one gallon of lubricating oil and about nine gallons of water. Modifications are planned to eliminate the need for the drip pan.

To avoid further conflicts in work areas and at present, prior to issuance of all Open Flame, Welding and Grinding Permits, the Fire Protection and Safety Coordinator or other properly qualified personnel will thoroughly inspect all affected work areas to ensure adequate precautions are taken.

ITEM

- B. "10 CFR 50.54 titled 'Conditions of Licenses' states in part: '...the following shall be deemed conditions for every license issued:...(e) The License shall be subject to...amendment for cause....'

Amendment No. 24 to License No. DPR-18 dated February 14, 1979, section 2(5) states in part: '...The licensee...is required to complete the modifications identified in Paragraphs 3.1.1 through 3.1.49 of the NRC's Fire Protection Safety Evaluation (SE) dated February 14, 1979.... These modifications will be completed in accordance with Table 3.1 of the SE....'

The implementation schedule in Table 3.1 of the Fire Protection Safety Evaluation Report requires that item 3.1.20, 'Service Water Piping in Diesel Room' to be completed by September 1979; and item 3.1.22 'Exterior Hydrants' to be completed by June 1979.

Contrary to the above, on October 24-25, 1979, the inspectors observed that the licensee has not implemented the above referenced modifications."

RESPONSE

Regarding the Service Water Piping protection required, it was found in mid September that approved material was not available on site. Also the

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Initial method of installing the protection was changed to improve overall effectiveness. As soon as a qualified supplier was established, a purchase of the material was initiated. A portion of the material arrived two weeks after the anticipated date. Upon its receipt, work was started and is continuing. As of this date the total work is nearly complete. By mid January we anticipate having the entire insulating job complete with only a few protective cover fittings lacking. The protective covers are not necessary for the satisfactory completion of the protection intended.

Regarding the exterior hydrants, the inspector noted in his report that the ground area surrounding hydrant No. 12 had not been graded to provide a 12 inch clearance between the ground and the center of the hydrant outlet port, but that only 6 inches was provided. This was a result of regrading work late in the summer. On October 31, 1979 work was completed to install a twelve inch spool piece to extend the height of this hydrant. A further inspection of all hydrants verified proper clearance.

The inspection report contains no information that is considered proprietary.

Very truly yours,

L. D. White, Jr.

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