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ROCHESTER GAS AND ELECTRIC CORPORATION • 89 EAST AVENUE, ROCHESTER, N.Y. 14649-0001

TELEPHONE
AREA CODE 716 546-2700

July 12, 1989

U.S. Nuclear Regulatory Commission
Region I

Attn: Thomas T. Martin, Director
Division of Reactor Safety
475 Allendale Road
King of Prussia, PA 19406

Subject: Inspection Report 50-244/89-04 and Notice
of Violation (PORV Block Valve Replacement)
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Martin:

By letter dated April 28, 1989, the NRC provided RG&E with the results of Inspection No. 50-244/89-04. Appendix A to that letter consisted of a Notice of Violation related to the extent of documentation addressing operability qualification of replacement PORV block valves. RG&E was requested to respond, within 30 days, and provide a written statement or explanation in reply to the Notice, including (1) the reasons for the violation, (2) corrective steps which have been taken and the results achieved, (3) corrective steps which will be taken to avoid further violations, and (4) the date the full compliance will be achieved. The Notice further stated that, where good cause is shown, consideration would be given to extending the response time.

Pertinent information regarding additional documentation supporting operability qualification of the replacement PORV block valves, as requested by the NRC inspector, was submitted on May 3, 1989. This was found to be acceptable, as stated in the NRC response, dated May 18, 1989. Since key RG&E personnel were fully engaged in completing the Spring 1989 Refueling Outage and its associated modification activities, and since the technical issues concerning the valves had been resolved, RG&E requested, by letter dated May 26, 1989, that an additional 45 days be allowed for our formal response to the Inspection Report and Notice of Violation.

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In accordance with 10 CFR 2.201, RG&E provides Attachment I to this letter as our reply to the Notice of Violation contained in Appendix A to NRC Inspection Report 50-244/89-04. The reply admits the violation and provides the explanatory information requested in the Notice of Violation.

Very truly yours,



Robert C. Mecredy
General Manager
Nuclear Production

JCM\054
Attachment

xc: U.S. Nuclear Regulatory Commission (original)
Document Control Desk
Washington, D.C. 20555

Allen R. Johnson (Mail Stop 14D1)
Project Directorate I-3
Washington, D.C. 20555

Ginna Senior Resident Inspector



ATTACHMENT I

Violation

NRC Inspection Report No. 50-244/89-04, Appendix A, identified the following violation:

"10 CFR 50, Appendix B, Criterion III requires that measures be established to assure that applicable regulatory requirements...are correctly translated into specifications, drawings, procedures and instructions." It further requires that, "design changes, including field changes shall be subject to design control measures commensurate with the original design."

"Contrary to the above, the licensee's Design Criteria and Safety Analysis for the PORV block valve replacement to be performed during the 1989 refueling outage did not address operability qualification of the replacement valves. Operability qualification of PORV block valves was a NUREG-0737 Item (II.D.1) committed to by the licensee as confirmed in Commission Order dated July 10, 1981."

RG&E admits to the violation.

Reason for Violation

The PORV Block Valve Replacement project Design Criteria document (Revision 0, dated January 22, 1986) sets forth the requirements for operability qualification. It references NUREG-0737, Section II.D.1, EPRI report NP-2541-LD, "EPRI/Marshall Electric Motor-Operated Valve (Block Valve) Interim Test Data Report" and NRC IE Bulletins 81-02 and 85-03. These referenced documents were reviewed when the project was initiated, and were consulted periodically during the conceptual design, detailed design, and procurement phases. Other sections of the Design Criteria (1.1.1, 1.1.2, 1.2.2, 1.3.2, 3.0, 4.0, 7.1, 8.1, 8.2, 13.1 and 13.2) also emphasize the anticipated service of the new PORV block valves.

The RG&E Safety Analysis for this project (Revision 0, dated January 22, 1986) specifically considers decreases in reactor coolant inventory, including inadvertent opening of a PORV. The Design Criteria document discussed above is specifically referenced in the Safety Analysis. The Design Criteria and the Safety Analysis constitute the project design input and address valve operability.

In the Design Criteria and Safety Analysis for this modification, RG&E did consider valve and operator operability requirements, and did reference NUREG-0737, Item II.D.1, as well as the EPRI-Marshall tests (Report NP-2541-LD). However, RG&E did not explicitly require that operability calculations supporting conformance to the EPRI-Marshall test results be generated.

RG&E did, however, explicitly address the subject of valve/operator qualification on the installation drawing for this modification. This was done by requiring conformance with our MOVATS commitments. RG&E considered that, based on extensive industry interaction with the NRC regarding the acceptability of MOVATS as a means of defining acceptable valve/operator operability, our commitment to



MOVATS superseded the commitment to NUREG-0737 as embodied by the EPRI-Marshall test results. (Note that Ginna-specific NRC acceptance for the use of MOVATS was provided by NRC correspondence, Carl H. Berlinger to William F. Kane, dated March 22, 1989.)

The omission of calculations demonstrating conformance to the EPRI-Marshall test results, using what RG&E considered to be an acceptable (and superior) alternative means of defining acceptable valve/operator operability, is considered the reason for the violation.

Corrective Steps Taken and Results Achieved

Corrective steps taken to resolve the issues involved in the notice of violation have consisted of assembling existing information and performing confirmatory additional analyses to demonstrate that operability of the replacement PORV block valves is assured. This information was transmitted to the NRC by letter, dated May 3, 1989.

Satisfactory results have been achieved. By letter dated May 18, 1989, the NRC Region I staff found the additional information to be comprehensive and responsive to their concerns regarding operability of the subject valves. No changes to the valve/operator were required as a result of this additional verification.

Corrective Steps to Avoid Future Violations

All references in Design Criteria documents which contain licensing commitments will be explicitly evaluated and justification for differences, such as superseding requirements, will be placed in the modification work package. This will be accomplished by revision of Procedure QE-301, "Preparation, Review and Approval of Design Input Documents".

Date When Full Compliance Will Be Achieved

August 15, 1989.



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 50-244/89-04.

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Washington, D.C. 20555

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Project Directorate I-3
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Ginna Senior Resident Inspector



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