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ACCESSION NBR: 8911200259 DOC. DATE: 89/11/07 NOTARIZED: NO DOCKET #  
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 MECREDY, R.C. Rochester Gas & Electric Corp.  
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SUBJECT: Forwards response to Suppl 1 to NRC Bulletin 88-010 re  
 nonconforming molded-case circuit breakers.

DISTRIBUTION CODE: IE21D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 4  
 TITLE: Bulletin Response 88-10 - Nonconforming Molded Case Circuit Breakers.

NOTES: License Exp date in accordance with 10CFR2,2.109(9/19/72). 05000244

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November 7, 1989


U.S. Nuclear Regulatory Commission  
Document Control Desk  
Attn: Allen R. Johnson  
Project Directorate I-3  
Washington, D.C. 20555

Subject: Response to NRC Bulletin 88-10, Supplement No. 1  
Nonconforming Molded-Case Circuit Breakers  
R.E. Ginna Nuclear Power Plant  
Docket No. 50-244

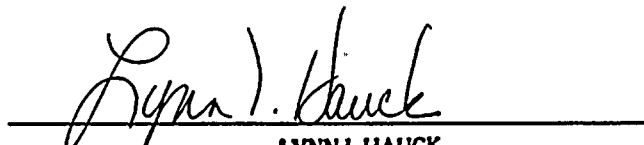
Dear Mr. Johnson:

Please find attached the RG&E responses to the NRC positions of Supplement 1 to NRC Bulletin 88-10. The clarification provided by Supplement 1 did not show cause for alteration of our original response to the subject Bulletin. However, in responding to this request, we have provided additional information to aid in your evaluation of this matter.

Very truly yours,

  
Robert C. Medredy  
General Manager  
Nuclear Production

Subscribed and sworn to before me  
on this 7th day of November, 1989.

  
LYNN I. HAUCK  
Notary Public in the State of New York  
MONROE COUNTY  
Commission Expires Nov. 30, 1990  
CJM\066  
Attachment

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

U.S. Nuclear Regulatory Commission  
Region I  
475 Allendale Road  
King of Prussia, PA 19406

Ginna Senior Resident Inspector

In the Rochester Gas and Electric response to NRC Bulletin 88-10, all concerns of the Commission relating to molded case circuit breakers were addressed. The clarification provided by Supplement 1 of 88-10 does not alter in any manner our response to 88-10. However, additional measures have been taken since our response of March 31, 1989 to further reinforce our confidence that molded case circuit breakers do not present adverse safety implications at the R.E. Ginna Nuclear Power Plant. These measures will be elaborated upon under the appropriate response to the NRC positions of Supplement 1 that follow.

1. NRC POSITION:

If CBs are traceable to an original plant construction order and the CBs were received prior to August 1983, there is reasonable assurance that the CBs are acceptable and no additional traceability is required.

1. RG&E RESPONSE:

All molded case circuit breakers purchased prior to August 1, 1983 are traceable to the manufacturer (detailed in Response No. 1 to Item 1 of 88-10). Subsequent to RG&E's March 31, 1989 response to 88-10, an internal audit was conducted by the RG&E QA and QC personnel to independently substantiate the validity of responses to 88-10. All requirements of 88-10 were investigated and no discrepancies in inventory control or documentation were found.

Further, an unannounced audit was performed on Westinghouse Electric Supply Co. (WESCO), the sole supplier of molded case circuit breakers to RG&E (other than the manufacturer). Results of this activity have provided satisfactory verification and substantiation of the WESCO supplied molded case circuit breakers to Circuit Breaker Manufacturer (CBM) traceability documentation as required by 88-10.

Additionally, the WESCO audit included discussions with WESCO management and technical personnel, review of inter-company correspondence, observation of order processing and inspection of warehousing and inventory, all of which provided satisfactory verification of established and implemented controls necessary to assure that molded case circuit breakers supplied to RG&E by WESCO will be new Westinghouse manufactured breakers.

2. NRC POSITION:

Visual inspection and physical examination of the CBs by the CBM is not considered adequate to meet the requested traceability provisions of Bulletin No. 88-10. Although visual inspection and physical examination by the CBM may provide a

reasonable basis that the CBs have not been opened or altered in a substantial way, there is no reasonable assurance that the CBs have not been previously used or subjected to service conditions that may have adversely affected the performance capabilities of the CBs.

2. RG&E RESPONSE:

Since all molded case circuit breakers purchased within the time period of concern were traceable to the manufacturer, visual inspection, or other alternative means of verification were not necessary. Therefore, this concern is not applicable to the R.E. Ginna Nuclear Power Plant.

3. NRC POSITION:

Item 4 of the action requested in Bulletin No. 88-10 applies only to CBs that were purchased and installed after August 1, 1983.

3. RG&E RESPONSE:

The actions requested of Item 4 of the Bulletin 88-10 were not applicable to Ginna since all molded case circuit breakers in question were traceable to the manufacturer.

4. NRC POSITION:

If an addressee identifies any CBs as nontraceable during the review requested by Bulletin No. 88-10, it should take appropriate corrective actions as required by Criterion XVI of 10 CFR Part 50, Appendix B. As part of these corrective actions, the NRC expects addressees to assess the acceptability of all installed safety-related CBs that were procured under the same purchase orders as the nontraceable CBs.

4. RG&E RESPONSE:

The concern of this position is not applicable to the R.E. Ginna Nuclear Power Plant since all molded case circuit breakers are traceable to the manufacturer.

5. NRC POSITION:

In an effort to limit the number of nonconforming CBs in safety-related systems, nontraceable CBs that were installed or are being maintained as stored spares as of August 1, 1988, and that successfully pass all tests specified in Attachment 1 of Bulletin No. 88-10 are considered acceptable for use only as replacements for safety-related CBs that are found to be nontraceable during the review requested by Bulletin 88-10. These breakers may not be used as safety-related replacements during other activities such as planned plant modifications or routine maintenance.



5. RG&E RESPONSE:

The concern of this position is not applicable to the R.E. Ginna Nuclear Power Plant since all molded case circuit breakers are traceable to the manufacturer.

6. NRC POSITION:

For CBs stored as spares that were not procured directly from the CBM, each individual CB should be reviewed in order to establish proper traceability, regardless of the number of CBs.

6. RG&E RESPONSE:

All circuit breakers stored as spares were reviewed and found to conform with the requirements of 88-10 and as explained in Response No. 1, were verified to be in conformance by independent audit.

7. NRC POSITION:

All safety-related CBs from the same procurement order are considered traceable provided that 1) the order was procured directly from a CBM having a quality assurance program in accordance with 10 CFR Part 50, Appendix B, 2) the CBM has been audited by the addressee in accordance with Appendix B, 3) the CBs were ordered as safety-related, and 4) documented evidence has been furnished to the addressee, such as a certificate of compliance. However, if safety-related CBs were procured from a vendor other than the CBM, a certificate of compliance by itself is not considered an adequate basis for establishing traceability. In such cases, traceability of individual procurement orders should be established through the review of procurement or shipping records back to the CBM. Telephone discussions with the CBM or vendor are not acceptable for establishing a basis for traceability. Traceability to a warehouse facility controlled by the CBM is considered equivalent to traceability to the CBM.

7. RG&E RESPONSE:

RG&E is in compliance with this position in that the traceability review was performed within the constraints of this position.

All documentation substantiating RG&E's response to the NRC positions of Supplement 1 to NRC Bulletin 88-10 have been retained and is available for review upon request.

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 AUTH. NAME AUTHOR AFFILIATION  
 MECREDDY, R.C. Rochester Gas & Electric Corp.  
 RECIP. NAME RECIPIENT AFFILIATION  
 JOHNSON, A.R. Project Directorate I-1

SUBJECT: Forwards response to Suppl 1 to NRC Bulletin 88-010 re  
 nonconforming molded-case circuit breakers. All molded-case  
 circuit breakers purchased prior to 830801 traceable to mfg  
 & actions requested in Item 4 not applicable.

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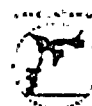
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November 7, 1989

TELEPHONE  
AREA CODE 716 546-2700


U.S. Nuclear Regulatory Commission  
Document Control Desk  
Attn: Allen R. Johnson  
Project Directorate I-3  
Washington, D.C. 20555

Subject: Response to NRC Bulletin 88-10, Supplement No. 1  
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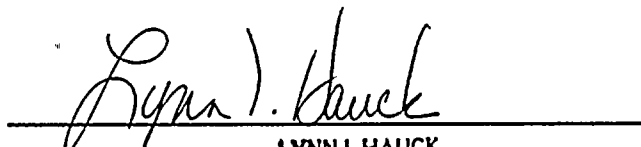
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Very truly yours,

  
Robert C. Medredy  
General Manager  
Nuclear Production

Subscribed and sworn to before me  
on this 7th day of November, 1989.



LYNN I. HAUCK  
Notary Public in the State of New York  
MONROE COUNTY  
Commission Expires Nov. 30, 1990

CJM\066  
Attachment

124  
11



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

U.S. Nuclear Regulatory Commission  
Region I  
475 Allendale Road  
King of Prussia, PA 19406

Ginna Senior Resident Inspector

## RESPONSE TO NRC BULLETIN 88-10, SUPPLEMENT 1

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