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 RUSSELL,W.T. Region 1, Ofc of the Director

SUBJECT: Responds to NRC 900309 ltr re violations noted in Insp Rept
 50-244/90-02.Corrective actions:

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April 5, 1990

Mr. William T. Russell
Regional Administrator
U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
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Subject: Response to Notice of Violation
Inspection Report of No. 50-244/90-02
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

This letter is in response to the March 9, 1990 letter from Jon R. Johnson, Chief, Project Branch 3 to Dr. Robert Mecredy, General Manager Nuclear Production, RG&E, which transmitted Inspection Report No. 50-244/90-02. The following provides a reply to the violation set forth in that report pursuant to 10 CFR 2.201.

Restatement of Violation

During inspection at the R.E. Ginna Nuclear Power Plant from January 9 through February 2, 1990, the following violation was identified and evaluated in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C):

10 CFR 50, Appendix B, Criterion XVI, and the Ginna Quality Assurance Manual, Section 16, require that measures be established to promptly identify and correct conditions adverse to quality.

Contrary to the above, a condition adverse to quality was not promptly corrected on January 25, 1990, when Ginna personnel failed to adequately verify the positions of the two steam admission check valves for the turbine-driven auxiliary feedwater pump during the quarterly surveillance of the auxiliary feedwater system. Seating of these check valves prevents a break in one steam generator from being fed by the other steam generator and is therefore a condition which assures quality. The NRC resident inspectors had previously identified the potential inadequacy of steam admission check valve position verification to Ginna management in December 1989. Ginna management had not subsequently established an adequate method of check valve position verification.

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RG&E Position of Existence of Violation

Rochester Gas & Electric Corporation (RG&E) concurs with the violation stated in Inspection Report No. 50-244/90-02, in that testing methodology failed to positively verify the positions of the two steam admission check valves for the turbine-driven auxiliary feedwater pump during the quarterly surveillance of the auxiliary feedwater system. The current design of the steam admission check valves does not provide positive position verification capability through the use of the counter-weight arm.

(1) Reason for Violation

As stated in Inspection Report No. 50-244/90-02, the NRC resident inspectors previously identified the potential inadequacy of steam admission check valve position verification to Ginna Management in December 1989. The resident inspectors felt that the vantage point used by the technician during position verification was inadequate. The resident inspectors suggested another vantage point to better identify check valve position. Management immediately discussed this observation with the Results & Test technicians and stressed the importance of proper vantage points when observing counter-weight arm movement.

Ginna Station Periodic Test Procedure PT-16Q, "Auxiliary Feedwater System - Quarterly" was performed on January 25, 1990. The performance of this test was witnessed by the R&T Supervisor and the Technical Manager. During this test, management questioned the technician as to his vantage point for observation of check valve counter-weight movement. From the technician's vantage point, both steam admission check valves were observed to move freely from the presumed closed position (counter-weight approximately vertical) to the presumed open position (above vertical position). Movement to a different vantage point was deemed unnecessary, since free movement of the check valves was observable during the test.

It was RG&E'S understanding that the issue raised during the December 1989 test was resolved. Subsequent questioning by the NRC resident inspectors identified further concerns regarding the adequacy of using the counterweight arms without a clearly marked reference point for "open" and "closed". This concern promptly led to each steam admission check valve being manually stroked using the counter-weight arm. When closing one of the check valves, the external operator arm moved past the full closed preset location. Since the valve counter-weight arm is not pinned to the valve shaft but is secured using two locknuts, movement of the counter-weight arm was possible without movement of the check valve shaft should the locknuts loosen. Since the external operator arm can be moved independently of the check valve shaft, RG&E has determined that visual observation of the operator arm cannot be used as a reliable indication of valve position.



(2) Corrective Steps Which Have Been Taken and the Results Achieved

RG&E has conducted a review of the check valves incorporated into the IST Program to determine if other check valves are susceptible to inadequate position verification from counter-weight arm movement. RG&E's review of the IST Program concluded that one other set of check valves use exterior counter-weight arms for position verification. However, these check valves (V-3518 & V-3519) have counter-weight arms which are positively attached to the valve stem.

RG&E has also conducted an assessment of the operability of the turbine-driven auxiliary feedwater steam admission check valves from 1988 to January 1990. RG&E has concluded that these check valves have been fully operable throughout this period. This conclusion is based upon free valve movement observed on a monthly basis, ability of the check valve to pass full accident condition steam flow, and disassembly of both steam admission check valves in 1989. The monthly test of the turbine-driven auxiliary feedwater pump is accomplished using one of two steam admission flow paths while assuring the turbine-driven pump delivers required accident feed flow. This test assures the check valve is capable of allowing full accident condition steam flow.

RG&E had determined on January 26, 1990 that the current steam admission check valve test methodology was inadequate due to the design of the external counter-weight arm assembly. RG&E has adopted the manual exercising of these check valves on a quarterly basis to satisfy IST requirements until a modification can be completed to provide positive position indication of the check valve seat.

(3) Corrective Steps Which Will Be Taken to Avoid Further Violations


As discussed above, RG&E has completed an evaluation of the IST Program and has determined that two valves (main steam check valves) use similar counter-weight arms for position verification. To enhance visible positive position verification ability and avoid confusion, RG&E will install a positive indicator for all four check valves. This modification is scheduled for completion by September 1, 1990. The quarterly auxiliary feedwater surveillance test, which includes manual exercising of the turbine-driven steam admission check valves will continue to be performed until the position indication modification can be completed.



(4) Date When Full Compliance Will Be Achieved

The modification to install enhanced position verification hardware is currently scheduled for completion by September 1, 1990. Until this modification is completed, RG&E will continue to demonstrate operability of the turbine-driven auxiliary feedwater pump steam admission check valves through manual exercising of these valves.

Very Truly Yours,



Robert C. Mecredy
Division Manager
Nuclear Production

RCM/jdw

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