

May 18, 1988

Mr. William T. Russell
Regional Administrator
U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

Subject: Inspection Report 50-244/88-04
Notice of Violation
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Russell:

In accordance with NRC Inspection Report 88-04 which stated:

"As a result of the inspection conducted on February 22-26, 1988, and in accordance with the "General Statement of Policy for NRC Enforcement Actions", 10 CFR 2, Appendix C, the following violation was identified.

10 CFR 50.55a(g) states that ASME Code Class 1, Class 2, and Class 3 components shall meet the requirements set forth in Section XI of the ASME Boiler and Pressure Vessel Code and Addenda. The facility inservice inspection program states that the facility will meet the requirements of Section XI, 1974 Edition through Summer 1975 Addenda with guidance from Section XI, 1977 Edition, Summer 1978 Addenda. ASME Section XI, 1977 Edition, Summer 1978 Addenda invokes ANSI N-45.2.6, 1973 for the qualification of personnel performing the visual examination VT-2, VT-3, and VT-4 and states that the practical examination shall be performed using parts representative of the Owner's plant. ANSI N-45.2.6, 1973 states that a file of records of personnel qualifications shall be maintained, and shall contain records of past performance history.

~~88-65250146~~ 3PP



Contrary to the above:

During the period from February 22, 1988 to February 26, 1988, personnel qualification records of QC Personnel certified by the licensee to Level II VT-2, VT-3, and VT-4 visual inspection did not contain records of past performance history, and the practical examination was not performed using parts representative of the Owner's plant."

the following is provided in response.

During the conduct of the inspection, discussions with the inspector indicated that the ability and capability (qualifications) of the Quality Control inspectors certified to ASME Section XI, VT2, VT3, and VT4 were not in question and that no immediate corrective action steps were necessary. This violation identifies two specific deficiencies in the qualification program for Quality Control inspectors to ASME Section XI VT2, VT3, and VT4 examination methods.

The first deficiency identifies the lack of sufficient detail in the qualification records for the inspectors qualified with respect to past performance history. Quality Control inspectors qualified to VT2, VT3, and VT4 will have their qualification records updated to reflect the time spent in the performance of activities such as receipt inspection of pressure retaining components and piping support materials, inspections and surveillance of plant systems and components during maintenance and testing activities, and inspections and surveillance conducted during and following modification activities such as seismic upgrade and pre-service leakage examinations. Documentation of this performance as additional basis for certification will be provided. Administrative procedure A-1002, Qualification of Inspection Personnel, will be reviewed and revised as necessary to assure future Quality Control inspector's qualifications for visual examination methods will be in accordance with the ASME Code, Section XI.

The second deficiency identifies the lack of a practical examination which utilized parts representative of the plant during the Quality Control inspectors qualification training. While a review of other plant records indicated that plant specific components were utilized during the training program, a practical examination utilizing these same parts was not administered as part of the qualification process. The reason for this violation is based on a difference in the interpretation of paragraph IWA-2300 of the ASME Section XI. RG&E interprets the code to mean that subparagraph (c) of IWA-2300 applied to the qualification of personnel to VT2, VT3, and VT4 and therefore based their qualification on ANSI N-45.2.6 as



required by this subparagraph. It should be noted that future editions of the ASME Code will be eliminating the visual examination method from the text and relying on ASNT-TC-1A for many reasons, not the least of which is the interpretation differences raised by paragraph IWA-2300. However, RG&E intends to provide corrective action for this violation. Practical visual examinations for VT2, VT3, and VT4 examination methods utilizing parts representative of the plant will be conducted for Quality Control inspectors qualified to VT2, VT3, and VT4. Their qualification records will be updated to reflect this examination.

The date when full compliance will be achieved will be December 31, 1988 upon the completion of the actions described above.

Very truly yours,

Bruce A. Snow

Bruce A. Snow
Superintendent
Nuclear Production

xc: U.S. Nuclear Regulatory Commission (Original)
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Washington, DC 20555



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