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 SNOW,B.A. Rochester Gas & Electric Corp.
 RECIP.NAME RECIPIENT AFFILIATION
 RUSSELL,W.T. Region 1, Ofc of the Director

SUBJECT: Responds to violations noted in Insp Rept 50-244/88-08.

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June 24, 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 50-244/88-08
Notice of Violation
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Russell:

Inspection Report 50-244/88-08 Appendix A, stated in part:

During the inspection conducted on April 6 - May 8, 1988, and in accordance with the General Statement of Policy and Procedure for NRC Enforcement Actions 10 CFR Part 2, Appendix C (Enforcement Policy 1986), the following violation was identified:

- 1A. Technical Specification 6.8.1 requires written procedures shall be established, implemented, and maintained covering activities referenced in Appendix A of Regulatory Guide 1.33, November 1972. Appendix A addresses procedures for General Plant Operations (paragraph B), and Equipment Control (paragraph A).

Licensee operations procedure O-1.1, Plant Heatup From Cold Shutdown to Hot Shutdown, requires, in part, valve 879 (safety injection test line outside containment isolation valve) be locked closed.

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Contrary to the above, on April 5, 1988, with the plant operating at approximately 100 percent power, the licensee discovered valve 879 unlocked and open.

- 1B. Licensee Administrative Procedure A-1401, Station Holding Rules, requires: "The securing and restoration of all apparatus affected by the "hold" shall be effected by an operator and verified by a second operator or STA."

Contrary to the above, on April 17, 1988, the resident inspector identified that during the securing and restoration of a portion of the Boric Acid System for repair two valves repositioned as part of the "hold" were not effectively tracked and/or verified and consequently were not repositioned properly following the "hold" restoration.

VIOLATION 1A

Rochester Gas and Electric Corporation (RG&E) agrees with Violation 1A as stated.

This event was initially identified on April 5, 1988 by RG&E during the performance of PT-2.1 (Safety Injection System Pumps). Test personnel, while performing the initial lineup for PT-2.1, found Valve 879 in the open position. Controlled by A-52.2 (Control of Locked Valve and Breaker Operation), valve 879 is a locked closed valve.

The following is RG&E's explanation and reply to this statement of violation 1A:

1. Reason for the violation:

RG&E investigations revealed that the last documented stroking of Valve 879 was March 24, 1988 during plant heatup. Procedure O-1.1 step 5.55.10 directs valve 879 be locked closed. This step was not performed completely and no independent verification documentation of the valves position was performed.

2. Corrective Steps Which Have Been Taken and the Results Achieved:

Valve 879 was closed and locked and a complete Safety Injection System lineup outside containment was performed. The results of the lineup check were that the Safety Injection System, with the exception of valve 879, had been correctly aligned for power operation.



Also the following valves were verified closed which provided isolation even with valve 879 open: Valves 879A, 879B, 879C, 884, and 2818 (reference RG&E Drawing 33013-1262). It was determined that with valve 879 open and the above valves closed the operability of the Safety Injection System was unaffected.

An interim policy on double verification was issued by the Operations Manager requiring the following in regard to realignment and verification of safeguards or Technical Specification related systems following maintenance, modifications, testing or other operational activities:

- a. All isolations and realignment shall be done in accordance with a procedure or a system/equipment alignment worksheet which requires two independent signoffs for each realignment.
 - b. All realignment steps in existing procedures shall be signed off by two persons knowledgeable in the system operation, the first being the actual realignment and the second being an independent verification.
3. Corrective Steps Which Will Be Taken To Avoid Further Violations:

An administrative procedure is currently being developed that will provide the specific guidance on accomplishment of independent verification, including the interim policy. This procedure will be in effect by September 2, 1988.

4. Date When Full Compliance Will Be Achieved:

Full compliance with the proper alignment was achieved on April 5, 1988 with the closure and locking of valve 879.

VIOLATION 1B

RG&E agrees with the violation as stated.

This event was initially identified on April 17, 1988, by the NRC resident inspector. During a weekend plant tour, the inspector identified valves 332 and 340, in the Boric Acid System, open. Procedure S-3.1B (Pre-operational Lineup Of Boric Acid System) and Station Flow Print 33013-1266 (Boric Acid), require both valves closed.



The following is RG&E's explanation and reply to this statement of violation 1B:

1. Reason for the violation:

RG&E investigations revealed that the valves were repositioned when part of the Boric Acid System was isolated and held to repair a small leak. Although valves 332 and 340 were repositioned they were not tracked as part of the "hold". When the Boric Acid System was restored following removal from "hold" status, valves 332 and 340 were overlooked. Both valves remained open with the filter unisolated and therefore did not affect the operability of the Boric Acid System (referenced RG&E Drawing 33013-1266).

2. Corrective Steps Which Have Been Taken and the Results Achieved:

The resident inspector notified RG&E who verified the valves open, closed them and checked the Boric Acid System alignment by performing procedure S-3.1B. The results of the lineup check were that the Boric Acid System with the exception of valves 332 and 340 had been correctly aligned for power operation.

Also see Item 2 violation 1A (Interim Policy On Double Verification).

3. Corrective Steps Which Will Be Taken To Avoid Further Violations:

An administrative procedure is currently being developed that will provide the specific guidance on accomplishment of independent verification, including the interim policy. This procedure will be in effect by September 2, 1988.

4. Date When Full Compliance Will Be Achieved:

Full compliance with the proper alignment was achieved on April 17, 1988 with the closure of valves 332 and 340.

RESPONSE TO NRC CONCERNS THAT A COMMITMENT MADE BY RG&E IN 1980, TO MEET THE REQUIREMENTS OF NUREG 0737 ITEM I.C.6 WAS NOT MET:

Review of both of the above events by Operation Management and a previous assessment by INPO, has determined that although the NUREG 0737, Item I.C.6 commitment was addressed in various specific realignment procedures, there was no administrative guidance which defines the overall methods that are necessary to assure that independent verifications are accomplished.



As a result, an administrative procedure is currently being developed that will provide the specific guidance on accomplishment of independent verification, including incorporation of the interim policy. This procedure will be in effect by September 2, 1988.

Very truly yours,

Bruce A. Snow

Bruce A. Snow
Superintendent
Nuclear Production

BAS/eeh

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