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 MECREDY, R.C. 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 50-244/88-16.

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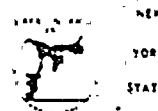
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November 4, 1988

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

Subject: Inspection Report 50-244/88-16  
Notice of Violation  
R.E. Ginna Nuclear Power Plant  
Docket No. 50-244

Dear Mr. Russell:

In accordance with NRC Inspection Report 88-16 which stated:

Technical Specification 6.8.1 requires, in part, written procedures shall be implemented covering surveillance and test activities of safety related equipment and the radiological environmental monitoring program.

Periodic Test procedure PT-12.1, Emergency Diesel Generator 1A, Revision 38, effective July 15, 1988, step 2.1 requires the 1A Emergency Diesel Generator be demonstrated operable and step 2.1.6 requires, in part, various local panel readings are verified within given acceptable values.

Contrary to the above, on August 8, 1988, PT-12.1 was performed with actual fuel oil pressure documented outside the range of acceptable values; and, on August 9, 1988, PT-12.1 was again performed with lube oil pressure documented outside the range of acceptable values. In each case, station personnel failed to declare the diesel inoperable.

Procedure PT-11.1, Heat Trace Circuitry Functional Check, Revision 9, effective October 16, 1987, step 1.1 requires, in part, Technical Specification required heat trace circuitry be insured operable.

Contrary to the above, on March 7, 1988, electrical maintenance personnel failed to notify operations personnel and declare Technical Specification required heat trace circuitry inoperable.

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Health Physics Procedure (HP) - 5.1, Area Radiation Surveys, Revision 24, effective May 12, 1988, step 6.4 requires, in part, survey results for the Auxiliary Building and other radiation areas will be entered on area maps and posted at the access control area.

Contrary to the above, on September 7, 1988, the inspectors discovered weekly maps documenting surveys performed on August 30 and September 1, 1988, had not been posted as required.

We believe the Notice of Violation contains one error. It refers to the lube oil pressure instead of to the out of specification condition identified in section 4 a for lube oil temperature.

1) Reason for the violation -

In response, RG&E concurs with the stated violation. In both Periodic Test (PT) procedures, the field test personnel followed the steps as written, initiating a trouble report for the identified deficiency. The procedures did not clearly require an evaluation to determine whether the declaration of equipment inoperability was warranted, or whether the deficiency was only intended to identify necessary maintenance when certain conditions are reached from a predictive maintenance standpoint.

The Health Physics (HP) weekly survey was taken as required by Health Physics Procedure HP-5.1 Area Radiation Surveys, however, the latest surveys were not posted due to personnel oversight as required by step 6.4 "Areas inside of controlled areas that have posted survey maps should have the most recent results and date."

2) Corrective steps which have been taken and the results achieved -

Both PT procedures have been revised to assure clarity of the need to evaluate the condition against the inoperability criteria and to assure implementation of the necessary tracking mechanisms for out of service equipment. These revisions were in progress at the time of the violation. Necessary personnel have been familiarized in this mechanism.

All personnel in the HP section have been reminded of the posting requirements. The requirements for posting the surveys have been added to the list of duties for the HP technician.

3) Corrective steps which will be taken to avoid further violations -

We concur that the review and approval of the completed test data needs better oversight to assure operability decisions along with analysis and trending of data. We have set and




will continue to set higher standards and clear criteria for operational and supervisory reviews on all critical information. Responsible personnel have been familiarized with these expectations and significant changes have already taken place.

- 4) Date when full compliance will be achieved -

All corrective action concerned with the specific violation have been completed, however, additional improvement will continue to be made. Additional information on the specifics of the ongoing improvement plan can be best conveyed in our discussion on Inspection Report 88-15.

Very truly yours,

  
Robert C. McCreedy  
General Manager  
Nuclear Production

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

Ginna Senior Resident Inspector

