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SUBJECT: Responds to NRC Bulletin 88-010, "Nonconforming Molded-Case Circuit Breakers."

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March 31, 1989

U.S. Nuclear Regulatory Commission
Document Control Desk
Attn: Mr. Carl Stahle
PWR Project Directorate No. 1
Washington, D.C. 20555

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

Dear Mr. Stahle:

Please find attached the Rochester Gas and Electric response to NRC Bulletin 88-10, Nonconforming Molded-Case Circuit Breakers. You will note that all molded-case circuit breakers found in Ginna controlled storage are directly traceable to the manufacturer.

Very truly yours,

Robert C. Mecredy
General Manager
Nuclear Production

Subscribed and sworn to before me
on this 31st day of March, 1989.

SAMUEL H. BROWNE
NOTARY PUBLIC, State of New York
Registration No. 4917041
Qualified in Monroe Cty. / Wayne Cty.
My Commission Expires Dec. 28, 19

CJM\027
Attachment

IE01
1/1

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

Ginna Senior Resident Inspector

Action Item 1:

All addressees are requested to perform the following review by March 1, 1989:

a. Identify all molded-case CBs purchased prior to August 1; 1988, that are being maintained as stored spares for safety-related (Class 1E) applications or commercial grade CBs that are being maintained as stored spares for future use in safety-related applications; this includes CBs purchased from a CBM or from any other source. If the number of these stored spare CBs is less than 50 at a nuclear plant site, then randomly select CBs purchased between August 1, 1983 and August 1, 1988 that have been installed in safety-related applications as replacements or modifications to form a minimum sample of 50 CBs per nuclear plant site.

b. Verify the traceability of these CBs.

c. Identify the number, manufacturer, model number, and to the extent possible, the procurement chain for all those CBs identified in (1a) that cannot be traced to the CBM. For installed CBs, also identify each system in which they are/were installed.

Response to Item 1:

a. A review of all molded case circuit breakers purchased by RG&E Purchase Orders for the Ginna Plant between January 1983 and August 1988 has been completed. Purchases, within the referenced time period, of molded case circuit breakers that could be used in safety-related circuits were initiated and controlled by eleven (11) separate Purchase Orders in contract with either Westinghouse Supply Company (WESCO) or directly with the manufacturer, the Westinghouse Corporation. These Purchase Orders appropriated 255 three pole magnetic and 23 three pole thermo-magnetic molded case circuit breakers for a total of 278. Most of these circuit breakers are currently in use and the remainder are maintained as stored replacements in a controlled storage area. Only one other Purchase Order was initiated for possible suspect molded case circuit breakers during this time period. This Purchase Order requisitioned 13 two pole circuit breakers and 4 three pole circuit breakers for non safety circuit applications. These circuit breakers are not traceable to the manufacturer. However, those that are in service are in non safety circuits such as lighting. Those that are not in service are in uncontrolled storage, consequently, prohibited for use in safety-related circuits by the Ginna QA/QC program. Also, it is important to note that there are no safety-related two pole applications at Ginna.

   An inventory of all stored molded case circuit breakers showed that only those three pole circuit breakers purchased by the above referenced traceable Purchase Orders or those purchased prior to January 1983, are available in controlled storage for replacement or new installation purposes. There are no two pole or single pole circuit breakers currently in controlled storage.

Although no single pole molded case circuit breakers are in controlled stock and no Purchase Orders for single pole molded case circuit breakers have been written for safety-related applications since January 1983, there are several applications for Westinghouse Model EA and Model E single pole molded case circuit breakers in safety-related instrumentation applications. Spare Westinghouse EA and E circuit breakers are located in most safety-related panel boxes and appear to be original circuit breakers when compared to the Westinghouse and NUMARC guidelines for determining authentic breakers. Additionally, 41 spare Westinghouse EA molded case circuit breakers were found in uncontrolled storage. Although those breakers appear to be original Westinghouse spares, 7 of these are suspect when using the Westinghouse and NUMARC guidelines. In all probability, since there are no purchase records for molded case single pole EA circuit breakers and as pointed out by NUMARC, single pole breakers are not likely to be refurbished, these breakers are probably authentic. Nonetheless, RG&E intends to qualify these breakers to an acceptable test program. Breakers that pass the testing will be placed in controlled storage. Those that fail will be discarded.

b. The Westinghouse Supply Company has certified that all three pole molded case circuit breakers purchased by RG&E for the Ginna Plant by the traceable Purchase Orders referenced in 1a. are traceable to the manufacturer, Westinghouse Corporation. This documentation is available at RG&E.

c. N/A. All three pole molded case circuit breakers stored for safety-related applications have been traced to the manufacturer.

Action Item 2:

All holders of operating licenses who identify installed CBs per Item 1 above or Item 4 below that cannot be traced to a CBM are requested to prepare, within 30 days of the completion of each item, an analysis justifying continued operation until Items 1 through 5 of the actions requested in this Bulletin have been completed.

Response to Item 2:

N/A. All three pole molded case circuit breakers installed or stored for safety-related applications have been traced to the manufacturer.

Action Item 3:

All addressees who identify 80 percent or more CBs traceable to the CBM per Item 1 above are requested to test the CBs that are not traceable to the CBM in accordance with the test program described in Attachment 1. Any installed CBs that fail any of these tests should be replaced with CBs that meet the criteria of Item 7 of the actions requested or CBs that pass all tests in accordance with the testing program described in Attachment 1. If more than 10 percent of the CBs tested fail any of the tests described in Attachment 1, continue with Item 4; otherwise, proceed to Item 6 of the actions requested.

Holders of operating licenses are requested to complete this testing program before startup from the first refueling outage beginning after March 1, 1989. Holders of construction permits are requested to complete this testing program before fuel load.

Response to Item 3:

N/A. All three pole molded case circuit breakers installed or stored for safety-related applications have been traced to the manufacturer.

Action Item 4

All addressees who identify less than 80 percent of the CBs traceable to the CBM per Item 1 above or who identify a failure rate of more than 10 percent of the CBs tested per Item 3 above are requested to perform the following actions:

a. Identify all molded-case CBs that have been purchased between August 1, 1983 and August 1, 1988, and installed in safety-related applications as replacements or installed during modifications.

b. Verify the traceability of these CBs.

c. Identify the number, manufacturer, model number, system in which they are/were installed, and to the extent possible, the procurement chain for all those CBs identified in (4a) that cannot be traced to the CBM.

Response to Item 4:

N/A. All three pole molded case circuit breakers installed or stored for safety-related applications have been traced to the manufacturer.

Action Item 5:

All addressees who identify installed CBs that cannot be traced to the CBM per Item 4 above are requested to replace these CBs with components that meet the criteria of Item 7 of the actions requested or to test them in accordance with the program described in Attachment 1. CBs that fail any of these tests should be replaced with CBs that meet the criteria of Item 7 of the actions requested or CBs that pass all tests in accordance with the test program described in Attachment 1.

Holders of the operating licenses are requested to replace or to test at least one-half, or all if the total number is less than 75, of these installed CBs before startup from the first refueling outage beginning after March 1, 1989. The remaining CBs should be replaced or tested before startup from the second refueling outage beginning after March 1, 1989.

Holders of construction permits are requested to replace or to test these installed CBs before fuel load.

Response to Item 5:

N/A. All three pole molded case circuit breakers installed or stored for safety-related applications have been traced to the manufacturer.

Action Item 6:

Information generated while performing the actions requested in Items 1, 2, 3, 4, and 5 above should be documented and maintained for a period of 5 years after the completion of all requested actions.

Response to Item 6:

RG&E assigned Corrective Action Report (CAR) No. 1924 to address all items of concern pertaining to NRC Bulletin 88-10. CAR records are kept in the Plant Central Records for the life of the Plant or the life of the item(s) addressed, whichever occurs first.

Action Item 7:

With the exception of actions taken in response to Items 3 and 5 of the actions requested above, molded-case CBs installed in safety-related applications after August 1, 1988 should be:

a. Manufactured by and procured from a CBM under a 10CFR50, Appendix B program; or

b. Procured from a CBM or others with verifiable traceability to the CBM, in compliance with applicable industry standards, and upgraded to safety-related by the licensee or others using an acceptable dedication program. The NRC encourages addressees to significantly upgrade their dedication programs through a joint industry effort to ensure their adequacy and consistency. The NRC will monitor these industry initiatives and if they are not sufficient or not timely, or if problems with the dedication of commercial grade equipment for safety-related use continue, the NRC will take appropriate regulatory actions.

Response to Item 7a:

Future Purchase Orders for molded-case circuit breakers will stipulate "new" breakers and breaker traceability documentation to the manufacturer. In addition, a certification statement is required for each breaker attesting that it is new and has been manufactured by an OEM facility.

Response to Item 7b:

Procurements of molded-case circuit breakers since January 1983 which are installed in safety-related applications, were covered by the RG&E QA Program. The program requires an onsite receipt inspection for physical damage and missing parts.

Upon completion of receipt inspection, magnetic molded-case circuit breakers are sent to the Electric Meter and Lab Department of RG&E for acceptance testing. Testing includes a rated current hold in test and an all pole adjustable instantaneous setpoint test. Unique identifier numbers are assigned to each circuit breaker and data sheets filled out identifying the trip characteristics and other relevant data.

Since December 1984, all thermal magnetic molded-case circuit breakers, upon completion of receipt inspection, are sent to the Ginna Electric Shop for testing. A time overcurrent trip test at 300% is performed and the breaker is placed in use or storage.

RG&E is currently participating in the NUMARC Industry Initiative on Substandard NSR Molded-Case Circuit Breakers and anticipates, to the extent practical, the adoption of guidelines developed by this program.