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CIL:50-244 Robert Emmet Ginna Nuclear Plant, Unit 1, Rochester G 05000244

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SUBJECT: Responds to NRC 890523 ltr re violations noted in Insp Rept 50-244/88-26.

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ROCHESTER GAS AND ELECTRIC CORPORATION • 89 EAST AVENUE, ROCHESTER, [illegible]

June 22, 1989

Mr. William T. Russell
Regional Administrator
U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Subject: NRC Inspection Report No. 50-244/88-26
Notice of Violation
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Russell:

Special Inspection Report 50-244/88-26 Appendix A, transmitted by letter dated May 23, 1989, stated in part:

During the inspection conducted on December 11-21, 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.

> 10 CFR 50, Appendix B requires correction of conditions adverse to quality. The Ginna Quality Assurance Manual, Section 16, Corrective Action, Paragraph 2.0 requires, in part, engineering identify, report, and correct conditions adverse to quality, Ginna Station correct conditions adverse to quality, and PORC recommend interim corrective actions.
>
> Contrary to the requirements of the Quality Assurance Manual, corrective actions for the frozen sensing lines on December 5, 1980 and implementation of these actions were inadequate to prevent sensing line failure on December 11, 1988.

**Reason for Violation:**

The freezing event on December 11, 1988 of two safety-related steam generator pressure sensing lines occurred due to cold outside air induction through closed, but non-leaktight intake dampers.

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The following is a summary of actions taken due to past concerns. During the time interval following the freezing event on December 5, 1980 a number of corrective actions were implemented as preventative measures. These included the addition of hardware measures such as insulating the affected sensing line and addition of seasonal plywood blanking plates over the air intake structures, and administrative changes to include development of procedural guidance for cold weather concerns. The cold weather walkdown practice initiated in 1980, and in place through the event of December 11, 1988, proved to be an effective deterrent until the most recent event.

It was evident from the recent event on December 11th that further compensatory actions were necessary. One of the major enhancements involved the addition of quantitative, objective criteria for temperature monitoring in sensitive areas. To support this effort, a total of fourteen (14) temperature sensing devices have been installed in temperature sensitive areas throughout the plant. Additional devices are available for installation as conditions require. Further corrective actions are as described below.

<u>Corrective Steps Taken and Results Achieved</u>:

1. Administrative Procedure A-54.4.1 "Cold Weather Walkdown", has been rewritten to provide a better trigger mechanism for initiation and to provide specific quantitative guidance for areas, components and temperature criteria. Specifically, whenever outside air temperature decreases below a given value, temperature logging requirements are initiated. In addition, specific calendar dates are provided to insure procedure implementation prior to anticipated cold weather concerns. Temperature values have been established to provide for priority corrective actions. For the area of concern in the Intermediate Building, temporary closure plates are administratively controlled to be installed prior to cold weather concern dates.

2. Additional thermometers have been installed in temperature sensitive areas throughout the plant. A total of fourteen (14) of these devices are currently identified on the Auxiliary Operator's log for temperature monitoring. Additional devices are available for use with installation and logging controlled under Administrative Procedure A-54.4.1.

3. An engineering evaluation was performed for the frozen tubing, which determined that the tubing configuration would permit the contents to expand, unrestrained, and thus result in low stresses in the tubing due to freezing. As an added assurance of the acceptability of the affected tubing, dimensional checks were made. All affected tubing was measured by sliding a machined gauge over the entire length excluding supports. No discrepancies were noted.

4. A complete system walkdown of other safety sensitive instrumentation was conducted with no additional immediate concerns noted. This included not only the Intermediate Building clean side, but also areas such as the Main Feedwater Pump Room, Screenhouse, Turbine Building, Diesel Generator Buildings, Auxiliary Building and Standby Auxiliary Feedwater Building. The temperature monitoring program established and controlled per A-54.4.1 will continue to assess these areas for any required protective measures.

## Corrective Steps Which Will be Taken:

In order to mitigate the potential for the recurrence of freezing, an Engineering Work Request has been initiated to perform a relocation of the affected steam generator pressure instrumentation tubing. The expected inservice date is September 1989. This is considered an enhancement to provide additional assurance of system operability and not a dependent requirement. In addition, an Engineering Work Request has been initiated to review the ventilation system in the Intermediate Building clean side. Any modifications resulting from this study will enhance the heating and cooling of all levels in this building. Although specific modifications have not yet been identified, we anticipate making permanent ventilation system changes prior to cold weather in the Fall of 1990. In addition, other areas of the plant have been reviewed and temperature indicators have been placed in all areas that have potential freezing capabilities. No other permanent modifications to ventilation systems are anticipated beyond the yearly temporary protective actions initiated each Fall.

## Date When Full Compliance Achieved:

Rochester Gas and Electric is presently in full compliance with program requirements.

Very truly yours,

Robert C Mecredy

Robert C. Mecredy
General Manager
Nuclear Production

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