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October 28, 1986

Dr. Thomas E. Murley, Regional Administrator  
U.S. Nuclear Regulatory Commission  
Region I  
631 Park Avenue  
King of Prussia, Pennsylvania 19406

Subject: RG&E Response to Systematic Assessment of Licensee  
Performance (SALP) Report No. 50-244/85-99

Dear Dr. Murley:

In response to your September 18, 1986 letter transmitting the SALP Report 85-99 and as a result of our October 7, 1986 meeting in Rochester, we are providing written comments.

In general, we agree with the report and appreciate the opportunity to discuss our performance over the SALP period with you. We note your assessment that our performance demonstrates a strong commitment to safe and efficient plant operations. Regarding strengthening of our Quality Assurance Program, we have been accelerating completion of our initiatives. These have been discussed with you and members of your staff and we will continue to keep you informed of our progress. We believe the issue of "informality with regard to station activities" is more properly addressed as an issue of "control of activities."

Two types of comments are provided. First, comments on the SALP-Board Observations regarding "an apparent attitude of informality at Ginna Station" are provided in Attachment A "RG&E Comments on Control of Activities." Second, specific comments on specific pages in the report are included in Attachment B - "RG&E Comments on SALP Report 50-244/85-99."

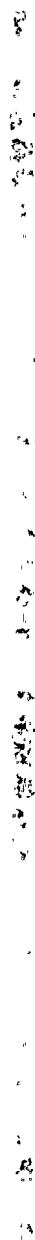
This discussion should provide you with assurance that the staff at RG&E is continuously striving for excellence in performance.

  
Roger W. Kober

Attachment

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ATTACHMENT A  
RG&E Comments on Control of Activities

We believe the issue of "informal versus formal" attitude to be one of "control of activities." It is necessary to review some of the formal programs already in place or in progress which are designed to improve our "control of activities." There are two modes that naturally apply when controlling activities. A reactive mode, logically entered for events such as plant trips or emergency maintenance, and a pro-active mode for pre-planning of activities.

Addressing the reactive mode, there are several formal processes already in place, in which the plant staff is quite proficient, which demonstrate control of activities. These processes include:

- o Post Trip Review (A-25.4)
- o Emergency Maintenance Procedures
- o Corrective Action System
- o Morning Priority Action Required (MOPAR)
- o Emergency Operating Procedures (EOPs)

Recovery from plant trips is accomplished by the plant staff safely and effectively in a formal fashion. Emergency Maintenance is planned in a well thought out manner and is formally approved by the Plant Operations Review Committee (PORC). Our control of operationa events has improved. The upgraded EOP's coupled with the newly installed simulator has strengthened our response to off-normal events.

However, we have identified additional areas to be evaluated which could improve our "control of activities." These are:

- o Root Cause Identification
- o Troubleshooting

The plant staff will review these areas and will implement those aspects which can improve our control of activities.

In the pro-active mode, the following programs/processes are in place to control activities.

- o PORC
- o QA/QC Sub-Committee
- o ALARA Committee
- o MOPAR



You are aware of these committees and have commented on them as strengths so no further elaboration is required here. The following programs are being developed and implemented:

- o Accreditation
- o Maintenance Procedure Upgrade  
(stressing acceptance criteria)
- o Maintenance Information System (MIS)
- o Objective Based Management Program (OBM)

These programs will improve our control of activities at all levels within the plant.

Several other areas will be evaluated by the plant staff to determine aspects which can improve our control of activities.

- o Concurrent Activity Identification  
and Control
- o Non QA Work Activity Control
- o OBM Planning
- o Conduct of Meetings

In reviewing performance at the plant, review of concurrent activities can be improved with the objective of identifying and eliminating potential conflicts. This concept has already been included in the MOPAR meetings and will continue to be stressed.

This discussion should provide you with assurance that the staff at Ginna is continuously striving for excellence in performance.

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Attachment B  
Specific Comments  
RG&E Response to Systematic Assessment of  
License Performance (SALP) Report No. 50-244/85-99

The following provides comments to specific pages for the purposes of clarification, updating information, and/or points of disagreement.

Page 9, 2nd paragraph regarding 1985 Reactor Trips on Steam Generator Levels (S/G).

This is provided for clarification and updating of the situation.

After close operations supervision of the startup following the 1986 outage, we have concluded that the subject trips had a root cause of equipment failure. This is based on the following:

1. I&C calibration of the Steam Dump Control System resulted in being able to operate in manual-auto during the startup with proper response obtained.
2. The feedwater flow transmitters were checked and recalibrated with the lower output set exactly at 10 millianps. While still somewhat inaccurate at very low power levels, their response was better than in previous years.

Page 12, regarding SALP Board Recommendation on housekeeping.

We agree with recommendation and will institute a formal housekeeping program. The program will consist of three phases: defining the standards, performing an education program, and implementating.

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Page 13, bottom paragraph regarding SWP clarification

The following is provided for as an update:

A procedure is currently being developed which will describe the purpose of each section of a work permit. This procedure will also outline the generally accepted interpretation for common work permit entries. This should reduce the chance of misinterpretation of the meaning of work permit requirements.

Page 14, 1st paragraph regarding ALARA policy:

A number of formal mechanisms have been and continue to be in place to ensure that radiation exposure is maintained ALARA and additional formal mechanisms are being developed. A Corporate ALARA Policy was issued by Francis E. Drake, Jr., the Corporate Chairman of the Board in 1978 and was updated by Paul W. Briggs, Chairman of the Board, in 1984. A much more detailed policy was issued in 1986. Plant ALARA procedures have been in place for a number of years and govern all activities at the plant, including modifications. After requirements for ALARA review of modification designs were added to Engineering Department procedures on November 1, 1985. A detailed checklist to assist in compliance with this review requirement is being prepared.

Page 14, 1st paragraph regarding Corporate Health Physicists job description:

The Corporate Health Physicist position description and list of duties was prepared and issued in November 1980. The position description and list of duties was revised in July 1985.

Page 15, 3rd paragraph regarding TLD correction factor:

The following is provided for update:

Our environmental TLD badges were submitted to the DOE for irradiation and subsequent readout at our facility. We have received verbal verification that our system is within normally acceptable range, but the official report has not yet been received.

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Page 18, 2nd paragraph regarding all Balance of Plant (BOP) instrumentation:

This is to clarify that it is our intent to provide controls and procedures for selective BOP instrumentation and not all.

Page 20, 2nd paragraph regarding QC backshift coverage:

RG&E will implement QC backshift coverage of selected preplanned safety related operations activities.

Page 22, bottom of page:

We assume the word "none" was omitted regarding the Board Recommendation for the Licensee and NRC.

Page 28, 2nd paragraph regarding fuel consolidation:

The discussion of fuel consolidation activities does not completely reflect all the circumstances surrounding that licensing issue. The NRC licensing issues involved were straight forward and did not involve the actual consolidation techniques. The initial request for license amendment and responses to NRC questions were submitted in a timely fashion. However, largely due to doubts within governmental organizations as to the likelihood that consolidation would actually take place, certain key NRC licensing milestones were delayed. All safety issues were resolved as required by the schedule and fuel consolidation was actually performed. RG&E kept the NRC apprised of all activities during the licensing process.

Page 34, bottom of page regarding the Board recommendation:

Since the end of the SALP review period, we have met with you and provided you with an update of our plans and progress. We will continue to keep you informed.

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