



ROCHESTER GAS AND ELECTRIC CORPORATION • 89 EAST AVENUE, ROCHESTER, N.Y. 14649-0001

TELEPHONE
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February 5, 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 50-244/87-27
Notice of Violation
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Russell:

Inspection Report 50-244/87-27 Appendix A, stated in part:

During an inspection conducted on October 26, 1987, through October 30, 1987, 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, Criteria XVI, requires that non-conformances be promptly identified and corrected and action taken to preclude repetition. ANSI N45.2.11-1974, Section 9, requires that the appropriate process and quality assurance program changes be made to prevent similar types of errors and deficiencies from recurring. The Ginna Station Quality Assurance Manual, Section Number 16, requires that repetitive nonconformances be promptly identified and the causes identified to preclude repetition.

Contrary to the above, on October 28 and 29, 1987, errors were identified on the Piping and Instrumentation Drawings (P&ID) and these errors were similar to deficiencies previously identified. The errors were not promptly identified, nor was corrective action taken to preclude repetition.



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Examples of some of the errors in the P&ID's are:

- P&ID 33013-1262, Safety Injection and Accumulator (SI), did not show the heat tracing on the RWST supply line.
- P&ID 33013-1248, Auxiliary Cooling Spent Fuel Pool Cooling, did not include the flange for the discharge connection to the temporary gas stripper pump.
- P&ID 33013-1258, Reactor Coolant System, shows valve V-547 as locked open contrary to procedure A-52.2, Control of Locked Valve and Breaker Operation which lists the valve as locked closed.

Additional examples are provided in the enclosed report and similar errors on the P&ID's were identified in Inspection Reports 50-244/87-08 issued on May 26, 1987, 50-244/86-18 issued on December 1, 1986, and 50-244/86-16 issued on November 3, 1986.

1) Reason for the Violation

As recognized in the inspection report, a Drawing Upgrade Task Force had been established, a P&ID Upgrade Program had been planned and implemented, and procedures had been put in place to control as-built P&ID's. These actions constituted appropriate process and quality assurance program changes to control as-built P&ID's.

It is recognized that some errors do exist in the P&ID's, and that the system for ongoing maintenance of these drawings needs improvement. As a result of internal review, it has been determined that the root cause of the identified deficiencies in the P&ID drawing control program can be defined as: a) lack of clear definition of the technical basis upon which the content of a system P&ID is based; b) inadequate communication of that technical basis to all user organizations; c) insufficient integration of procedural requirements between organizations which prepare and use such drawings; and d) inadequate field walkdowns and review of results during the initial upgrade program.

2) Corrective Steps Which Have Been Initiated:

To address the root cause, it is proposed that corrective action be taken in two steps. In the short term, immediate action will be taken as follows. All P&ID discrepancies which have been or may be identified from the following sources will be addressed and/or documented: a) NRC Inspection Report No. 50-244/87-27; b) RG&E Quality Assurance Audit No. 87-67:JB (November 17, 1987 to



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December 17, 1987); c) all open Drawing Change Requests (DCR) affecting P&ID's; d) all other discrepancies which have been identified by plant staff; and e) any other discrepancies identified. Drawing revisions and an independent self-assessment will be made of these immediate actions and will be completed prior to March 31, 1988. Finally, a P&ID Task Force with a designated Team Leader has been formed and has been assigned responsibilities for longer term corrective actions. The P&ID Task Force Team Leader reports to a Management Action Group (MAG). The P&ID Task Force had its initial meeting on February 1, 1988.

3) Corrective Steps Which Will Be Taken to Avoid Future Occurrences:

The P&ID Task Force will be responsible for the second step of the corrective action. That is, the Task Force shall develop, monitor, and oversee implementation of a long term plan to ensure the as-built integrity of all Ginna Station System P&ID's. The long term plan will upgrade the P&ID Program as follows:

- a) establish a well defined P&ID technical basis with respect to controlled plant configuration;
- b) evaluate and modify, if necessary, the procedural process for control and change of P&ID's;
- c) establish and coordinate a familiarization program for interpretation, use, and change of P&ID's;
- d) establish the scope for additional field walkdowns, including direct involvement of operators;
- e) establish the priority for the P&ID Upgrade Program;
- f) develop a resource assessment to support the P&ID program in accordance with an agreed upon schedule;
- g) implement this action plan by the P&ID Task Force;
- h) conduct field walkdowns by the end of 1988 for accessible systems and by May 1, 1989, for inaccessible systems;
- i) incorporate as-built data into revised drawings;
- j) perform self-assessment via Quality Assurance Audit(s);
- k) and issue as-built drawings.



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Management will assure that adequate priority and resources are applied to resolve this issue in a timely fasion. In addition, RG&E is reviewing other areas to identify and establish corrective action plans for any similar deficiencies.

4. Date When Full Compliance Will Be Achieved:

Full compliance will be achieved for all Ginna Station System P&ID's by June 30, 1989.

Yours truly,

Bruce A. Snow

Bruce A. Snow
Superintendent of Nuclear
Production

BAS/pjb

Subscribed and sworn to me
on this 5th day of February 1988

Lynn I. Hauck

LYNN I. HAUCK

Notary Public in the State of New York

MONROE COUNTY

Commission Expires Nov. 30, 1988

xc: U.S. Nuclear Regulatory Commission
Document Control Desk
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C. Marschall
Ginna Resident Inspector

