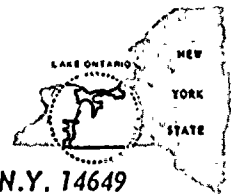




ROCHESTER GAS AND ELECTRIC CORPORATION • 89 EAST AVENUE, ROCHESTER, N.Y. 14649

JOHN E. MAIER
VICE PRESIDENT

TELEPHONE
AREA CODE 716 546-2700



July 2, 1981

Mr. Eldon J. Brunner, Chief
U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

Subject: I&E Inspection Report 81-08
Notice of Violations
Failure to Meet Tech Specs 3.7.2.b, 3.1.5.1, 6.9.2.b.2.
R. E. Ginna Nuclear Power Plant, Unit No. 1
Docket No. 50-244

Dear Mr. Grier:

In accordance with the above subject which stated:

"As a result of the inspection conducted on April 1, 1981 through April 30, 1981 and in accordance with the Interim Enforcement Policy, 45 CFR 66754 (October 7, 1980), the following violations were identified:

- A. Technical Specification 1.4 defines Operable as "Capable of performing all intended functions in the intended manner."

FSAR Section 8.1.1 states, in part, "Two diesel generator sets are connected to the engineered safety feature buses to supply emergency shutdown power in the event of loss of all other a.c. auxiliary power."

Technical Specification 3.7.2.b states, in part, "Power operation may continue if one diesel generator is out of service provided (a) the remaining diesel generator is run continuously..."

Contrary to the above, on April 7, 1981, the 'B' Diesel Generator was not run continuously when the 'A' Diesel Generator electrical breaker to engineered safety feature Bus 18 was taken out of service.

- B. Technical Specification 3.1.5.1 states, in part, "An investigation to determine the location of the leakage from the primary coolant shall be initiated... The reactor shall be placed a hot shutdown condition or the leaking sections isolated within 24 hours... if (a) Any leakage from the reactor coolant system pressure boundary is known to be through a pipe, vessel, or valve body..."

Contrary to the above, as of April 15, 1981, a leakage investigation of the letdown system performed on April 10, 1981 was not adequately conducted to conclusively indicate that a primary coolant leak had

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been acceptably isolated; in that, the letdown line suction valve (427), which is designed to fail open, served as the means of isolation between the Reactor Coolant System (RCS) and a potentially suspect section of RCS pressure boundary piping which had not been confirmed to be intact.

- C. Technical Specification 6.9.2.b.2 requires a written report to be submitted to the NRC Regional Office within thirty days following a condition leaking to operation in a degraded mode permitted by a limiting condition for operation.

Contrary to the above, as of April 30, 1981, written reports were not submitted for the following instances of operation in a degraded mode permitted by a limiting condition for operation.

- On January 16, 1981, for a period of approximately nine hours, the primary coolant leak detection systems sensitive to radioactivity were not in service. Operation in this condition is permitted by Technical Specification 3.1.5.3 for up to 48 hours without requiring further action.
- On February 13, 1981, during surveillance testing, the Pressurizer Level Transmitter (LT-428) output signal failed low due to a faulty channel amplifier. In accordance with Technical Specification 3.5.1, the number of channels to initiate a reactor trip remained in a one-out-of-two instrumentation logic until the failed amplifier was replaced.

the following is submitted in response.

For item A, the cause for this violation was an improper understanding of the term "operable". Maintenance procedures for the electrical breakers did not include the initial condition to declare the D/G inoperable.

To correct this procedure deficiency, these procedures have been revised to declare the D/G inoperable when performing maintenance on the output breakers.

For item B, the investigation revealed that although the incident was discussed at three separate PORC meetings in detail, the cause for this item of noncompliance was a failure of the PORC to recognize that the RCS system could be unisolated based upon a Containment Isolation Signal which would remove CV Instrument Air and/or failure of instrument air to Containment subsequently resulting in pressure on the isolated portion.

Corrective action to correct this situation will be to develop a lesson outline of this event and provide a training session for PORC members and alternates to be completed by 09/30/81.

For item C, the cause for failure to report conditions leading to operation in a degraded mode permitted by Tech Specs is as follows;

Regarding the 01/16/81 event, the investigation revealed a procedure inadequacy of procedure A-52.4, Control of Limiting Conditions in that it did not require to place the iodine monitor in service upon loss of the containment and particulate monitors.

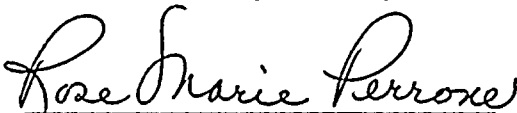
Regarding the 02/13/81 event, the cause was determined to be an inaccurate interpretation of reporting requirements when placing a channel in trip mode.

To correct these items, procedure A-52.4 has been revised to require the operator to place the iodine monitor in service upon loss of containment and particulate monitors. The correct interpretation of Tech Specs, whereby placing a channel in trip mode at power operation is an LCO, has been discussed with PORC members.

Very Truly yours,


John E. Maier

Subscribed and sworn to me
on this 2nd day of July 1981.



ROSE MARIE PERRONE
NOTARY PUBLIC, State of N. Y., Monroe County
My Commission Expires March 30, 1982

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