

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

JOHN E. MAIER
Vice President

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October 14, 1981

Mr. Eldon J. Brunner, Chief,
Projects Branch #1
Division of Resident and Project Inspection
U. S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

Subject: IE Inspection Report 81-15
Notice of Violations
Failure to Meet Tech. Specs. 4.1.2, 6.9.2.6.2
R. E. Ginna Nuclear Power Plant, Unit No. 1
Docket No. 50-244

Dear Mr. Brunner:

In accordance with the above subject which stated:

"As a result of the inspection conducted on August 1, 1981 through August 31, 1981 and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified:

- A. Technical Specification 4.1.2 states, "Equipment and sampling tests shall be conducted as specified in Table 4.1.2."

Technical Specification Table 4.1-2, entitled Minimum Frequencies for Equipment and Sampling Tests, requires a weekly test for tritium concentration in the reactor coolant system.

Contrary to the above, tritium samples collected on July 7, 14, 21 and 28, 1981 were not counted until August 5, 1981.

- B. Technical Specification, (TS) 3.13.2 allows continued hot shutdown or power operation for up to 72 hours without all hydraulic snubbers listed in TS Table 3.13-1 operable, otherwise the reactor must be in a cold shutdown condition within the next 36 hours.

Technical Specification 6.9.2.b.2 requires a written report to be submitted to the NRC Regional Office within thirty days following

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a condition leading to operation in a degraded mode permitted by a limiting condition for operation or plant shutdown required by a limiting condition for operation.

Contrary to the above, as of August 31, 1981, a written report had not been submitted documenting that six hydraulic snubbers listed in Table 3.13-1 were deemed inoperable during functional testing performed May 20 through May 27, 1981. The functional tests were performed during the 1981 refueling outage at cold shutdown conditions; however, the failures could not be attributed to a specific cold shutdown activity."

the following is submitted in response.

- A. Since plant startup at Ginna the primary coolant tritium samples have been collected weekly and analyzed monthly. This interpretation of the Technical Specification was probably influenced by the fact that tritium build-up is essentially a slow process. The two methods of formation are on (n - α) reaction with Lithium - 6 and a tertiary fission byproduct within the fuel itself. Another factor which influences this was probably the fact that the tritium analysis technique lends itself to performing this analysis on a large group of samples at one time. To correct this situation an order was placed in the HP/Chem Tech Day Order Book on 8/6/81 requiring weekly analysis of the primary coolant for tritium weekly instead of monthly. PC 1.1 Primary Coolant Analysis Schedule & Limits also was changed to reflect this requirement. The requirement for a weekly tritium analysis on the primary coolant seems to have no basis since there are no limits in the Technical Specifications, there are no limits on the concentration in the primary coolant. Also the NRC Standard Technical Specifications have no requirement for a tritium analysis on the primary coolant. Therefore since there is no obvious reason for this analysis an Engineering Work Request is being initiated to determine if a Technical Specification change should be initiated to remove this requirement from the RG&E Tech Specs.
- B. For item B, the cause for the violation was a misinterpretation of Technical Specification 4.14.7 which states that "hydraulic shock suppressors (snubbers) found inoperable during functional testing shall be restored to operable status prior to being returned to service." In the past, hydraulic shock suppressors have been functionally tested only during plant shutdowns. During this period of time, the snubbers were not required to be operable

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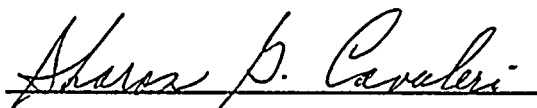
and therefore failure during functional testing was not considered to be reportable. The error in interpretation is a failure of RG&E to evaluate the possibility of the snubber being in an "inoperable" condition from the last visual inspection (as required by Technical Specification 4.14.2) and the performance of the functional test. To prevent this condition from recurring, plant procedure M-40.8, Functional Testing of Hydraulic Snubbers, has been revised to require an A-25.1 to be initiated to evaluate the reportability of each functional test failure.

Very truly yours,



John E. Maier

Subscribed and sworn to me
on this 14th day of October 1981.



SHARON G. CAVALERI
NOTARY PUBLIC, State of N. Y., Monroe County
My Commission Expires March 30, 1983

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