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 FACIL: 50-244 Robert Emmet Ginna Nuclear Plant, Unit 1, Rochester G 05000244
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 RUSSELL, W. T. Region 1, Office of Director

SUBJECT: Responds to NRC ltr re violations noted in Insp Rept
 50-244/87-08. Util disagrees with Violation A. Corrective
 actions: training class re control of valve post-maint
 testing & mgt level review re control of maint activities.

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June 24, 1987

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

Subject: Inspection Report 50-244/87-08
Notice of Violations
R. E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Russell:

Routine Inspection Report 50-244/87-08 Appendix A, stated in part:

"During the inspection conducted on March 15, 1987 through April 18, 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 violations were identified:

- A. Technical Specification 3.3.2.2 states in part; "Prior to initiating repairs, all valves in the system that provide the duplicate function shall be tested to demonstrate operability".

Contrary to the above, on April 9, 1987, operability of duplicate valve MOV 860A was not demonstrated prior to adjusting the packing on MOV 860B in the containment spray system.

- B. Technical Specification 3.14.4.1 states in part: "If a spray/sprinkler system is inoperable, except for testing, within one hour, establish a continuous fire watch with backup fire suppression equipment in those areas in which redundant systems or components necessary for safe-shutdown could be damaged...".

Contrary to the above, on March 16, 1987, fire suppression systems in areas necessary for safe-shutdown were rendered inoperable for approximately one hour and twenty minutes without continuous fire watches with backup fire suppression equipment being stationed in these areas.

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The following is submitted in response to Violation A:

Rochester Gas & Electric Corporation does not agree with the violation as stated in the Notice of Violation in that this valve was not removed from operable status without pre-maintenance operability testing on redundant valves. During normal plant operations, minor packing leaks develop on valves, which if left uncorrected, will lead to long term degradation of the valves and piping on systems containing high concentrations of boric acid. Periodic minor packing adjustments can be performed on these valves without rendering the safety systems inoperable. These actions would not require the pre-verification of redundant components as identified in paragraph 3.3.2.2.C of the Technical Specification.

We do acknowledge that improper categorization of the Trouble Report on the packing leak of this valve led to work control, including post-maintenance testing, that we consider inadequate for an important safety system valve.

Corrective steps which have been taken and the results achieved:

1. The review and root cause analysis of the event as stated above.
2. The Pipefitter foreman held a documented training class on 4/23/87 to discuss the importance of proper review and control of maintenance work orders and requirements for post-maintenance testing on AOVs and MOVs.
3. The Maintenance Manager held a review session with the Maintenance Supervision Reviewers on importance of control of maintenance activities. An outcome of the session yielded a department commitment to draft a new Maintenance Work Order and Trouble Report Form (MWOTR).
4. Follow-up MWOTR 87-2133, and 87-2167 to assure packing adjustment minimized system leakage with CV spray pump operating (discharge pressure) on MOV-860B followed by sequential post-maintenance testing per applicable steps of PT-3 surveillance test.
5. The Maintenance Manager had a briefing on the subject at the Maintenance Foremen's Meeting of April 23, 1987.
6. Generation of a new planning, scheduling and coordination of maintenance activities form to aid supervision in addressing the adequacy of maintenance controls. Completed forms were first distributed within "Ginna Station Activities Schedule For The Week of 6/01/87 through 6/07/87".



7. The Ginna Station Maintenance Section has been temporarily re-organized to provide a structure for formally reviewing and controlling maintenance activities performed using the Maintenance Work Order and Trouble Report. Included in this re-organization will be the use of a licensed Senior Reactor Operator to review all work orders for technical specification, operating and planning requirements and the review of all work orders by the Quality Control Engineer for applicability of proper Quality Assurance requirements.

Corrective steps which will be taken to prevent recurrence to ensure that all future station maintenance activities are reviewed appropriately, evaluated for their impact on Technical Specification requirements and proper pre-planning and controls are performed before maintenance activities commence, the following action is:

1. Maintenance Manager will provide training session to all Maintenance Supervisors and Foremen during a weekly meeting. The session will address A-1603 (Maintenance Work Order and Trouble Report) procedure on the establishment of conditions required to perform maintenance. Target completion date is 8/28/87.

The following is submitted in response to Violation B:

Rochester Gas and Electric Corporation (RG&E) agrees with violation B in that from 0940 EST on March 16, 1987, until 1100 EST on March 16, 1987 (a lapsed time of approximately 1 hour and 20 minutes) many of the plant's spray/sprinkler systems were inadvertently rendered inoperable without a fire watch and backup fire suppression being established, thus exceeding the requirements of section 3.14.3.1 of the plant Technical Specifications.

This event was initially identified by RG&E and documented in correspondence to the Nuclear Regulatory Commission (NRC) in Licensee Event Report (LER) 87-003 dated April 15, 1987.

Although the above systems would not have operated as designed, the area fire detectors were still operating and if a fire in any of the areas existed a visual indication at the fire control panel in the Control Room would have been received. Should indication have been received, the Station Fire Brigade would have been activated and they could have operated the suppression system locally at the hydraulic release stations. The fire service pumps could have been started manually from the Control Room.

Also fire barriers are located throughout the plant to separate major areas from each other and also to separate certain safety related areas from the remainder of the plant. These are designed to stop a fire from propagating from one area to another. All penetrations in these barriers are sealed with appropriate



materials to match the requirements of the barrier. It is reasonable to assume that even if a fire went undetected in an area that the fire would be restricted to that area due to the installed fire barriers.

Finally the Ginna Station Fire Hazard Safe Shutdown Analysis assumes achieving and/or maintaining cold shutdown status from a fire in any area of the plant. Modifications have been made and procedures developed to assure this.

The following is RG&E's explanation and reply to this statement of violation:

1. Reason for the violation:

The reason for the stated violation was that a major portion of the fire system detection alarms and automatic suppression were rendered inoperable due to the "Alarm Off" button on fire system Satellite Station A (SSA) being depressed. This "Alarm Off" button was depressed because of the operators failure to follow procedural direction while performing a fire system disconnect procedure, (i.e. there was a distinct step in the disconnect procedure that instructed the operator to, "release the "Alarm Off" button by depressing it again and verifying the trouble light goes out"). The operator inadvertently did not do this.

2. Immediate Corrective Action Taken and Results Achieved:

Directly after discovery, the "Alarm Off" button on SSA was immediately restored to normal status thus restoring the fire system to operable status.

3. Corrective Action Taken or Planned to Prevent Recurrence:

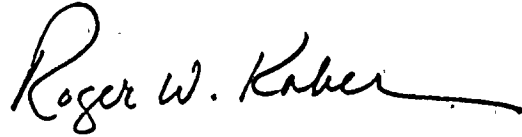
- a. Changes were made to SC-3.16.2.4 (Fire Signaling System/Component(s) Disconnection-Reconnection) procedure that states, "Independent verification of procedural adherence shall be performed within 1 hour whenever this procedure is utilized. Adherence shall be verified by a Licensed Operator or a knowledgeable fire control and safety person designated by the Fire Protection and Safety Coordinator.
- b. An Engineering Work Request (EWR) has been implemented, with high priority status, to provide an alarm light to be located on the Control Room fire display panel to clearly indicate when the fire system has been disconnected/reconnected either by choice or inadvertently.



4. Date When Full Compliance Will Be Achieved:

Full compliance with Technical Specifications Section 3.14.3.1 was achieved on March 16, 1987 at 1100 EST when the SSA "Alarm Off" button was restored to normal, restoring the fire system operability.

Very truly yours,

A handwritten signature in cursive script that reads "Roger W. Kober". The signature is written in dark ink and has a long, sweeping horizontal line extending to the right.

Roger W. Kober

xc: Document Control Desk

