

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8710270075 DOC. DATE: 87/10/09 NOTARIZED: NO DOCKET #
 FACIL: 50-244 Robert Emmet Ginna Nuclear Plant, Unit 1, Rochester G 05000244
 AUTH. NAME AUTHOR AFFILIATION
 KOBER, R. W. Rochester Gas & Electric Corp.
 RECIP. NAME RECIPIENT AFFILIATION
 RUSSELL, W. T. Region 1, Ofc of the Director

SUBJECT: Responds to NRC ltr re violations noted in Insp Rept
 50-244/87-18. Corrective actions: new form for planning,
 scheduling & coordination of maint activities generated to
 aid supervision in addressing adequacy of maint controls.

DISTRIBUTION CODE: IE01D COPIES RECEIVED: LTR 1 ENCL 0 SIZE: 6
 TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

NOTES: License Exp date in accordance with 10CFR2.2.109(9/19/72). 05000244

| RECIPIENT ID CODE/NAME | COPIES LTTR ENCL | RECIPIENT ID CODE/NAME | COPIES LTTR ENCL |
|---------------------------|---------------------|---------------------------|---------------------|
| PD1-3 PD | 1 | STAHLE, C | 2 2 |
| INTERNAL: AEOD | 1 | DEDRO | 1 |
| NRR MORISSEAU, D | 1 | NRR/DOEA DIR | 1 |
| NRR/DREP/EPB | 1 | NRR/DREP/RPB | 2 2 |
| NRR/DRIS DIR | 1 | NRR/PMAS/ILRB | 1 |
| DE LIEBERMAN, J | 1 | OGC/HDS2 | 1 |
| <u>REG FILE</u> | 1 | RES DEPY GI | 1 |
| RGN1 FILE 01 | 1 | | |
| EXTERNAL: LPDR | 1 | NRC PDR | 1 |
| NSIC | 1 | | |

TOTAL NUMBER OF COPIES REQUIRED: LTTR 20 ENCL 0



R



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

ROGER W. ROSEN
VICE PRESIDENT
ELECTRIC PRODUCTS

TELEPHONE
AREA CODE 716 546-2700

Ginna Station

October 09, 1987

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

USNRC-DS
1987 OCT 26 A 9 53

Subject: Inspection Report 50-244/87-18
Notice of Violation
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Russell:

Routine Inspection Report 50-244/87-18, Appendix A, stated in part:

"During an 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 violation was identified:

Technical Specification 6.8.1 states that written procedures shall be established, implemented, and maintained covering activities referenced in Appendix A of Regulatory Guide 1.33, November 1972. Appendix A, Paragraph I "Procedures for Performing Maintenance" discusses control of maintenance and repair.

Contrary to the above, on April 9, 1987, the licensee failed to control safety-related maintenance in that, Ginna Station Maintenance Work Request Trouble Report 87-2080 written to adjust a packing leak of Motor Operated Valve (MOV) 860B (containment spray pump "A" discharge valve) was designated as "Non-QA" work by the responsible maintenance reviewer. Furthermore, after performing the above maintenance, no post-maintenance testing of MOV 860B was performed to demonstrate operability".

8710270075 871009
PDR ADOCK 05000244
Q PDR

1501 1/0



Rochester Gas and Electric Corporation agrees with the above violation in that Technical Specification 6.8 states that written procedures shall be established, implemented and maintained covering activities referenced in Appendix A of Regulatory Guide, 1.33, November 1972. MOV 860B is a QA item requiring post-maintenance testing. We had already recognized potential weaknesses in our maintenance controls prior to this violation, and had been preparing corrective actions to address control of maintenance activities and post-maintenance testing of maintenance activities.

1. Cause for violation:

The root cause of this event was inadequate identification, review, planning and control of maintenance activities when conducted using the Ginna Station Maintenance Work Request Trouble Report (MWRTR). Had this work order been written or reviewed or classified or planned properly, existing procedures and controls over maintenance activities would have guided maintenance personnel through the proper steps.

- a. The valve was incorrectly identified by the initiator as "V-860B Containment Spray Pump A". The fact that the valve was not designated as a Motor Operated Valve (e.g. MOV 860B) made it less likely that maintenance supervision would recognize the automatic function and testing requirements associated with the maintenance on this valve.
- b. The MWRTR was reviewed by the proper maintenance supervision, as defined in Step 3.2.1.1 of Administrative Procedure A-1603. However, it is apparent that some items that are delineated in Step 3.2.3 of A-1603 for review were not correctly evaluated when reviewing this work order.
 - i. "Notify the Shift Supervisor prior to start". This item was not checked. A-1603 states "This should be checked for work that directly effects plant operation or directly effects the function of safety-related or Tech. Spec. equipment on systems". This item should have been checked.



- ii. "Notify QC prior to start". This item was not checked. A-1603 states that this be checked, "For work performed by the Maintenance group where QC coverage will be required". Any motor operated valve maintenance would normally require QC coverage. This item should have been checked.
 - iii. "Notify R&T upon completion". This item was not checked. A-1603 states "should be checked to identify where Results & Test Group must test the equipment after maintenance". Any valve identified in the Ginna Station Quality Assurance Manual Appendix C is required to have this item checked. Because the valve was incorrectly identified as a manual valve, and was not recognized as a Motor Operated Valve, Maintenance supervision did not realize that the valve on the referenced work order was an Appendix C valve. This item should have been checked.
 - iv. "Notify the Shift Supervisor upon completion". This item was not checked. A-1603 states that "This should be checked if 4.1 (notify Shift Supervisor prior to start) was required". This item should have been checked.
- c. Several opportunities existed for licensee personnel to identify that this valve was a MOV covered by Technical Specifications. As stated in the Inspection Report, "the pipefitter who performed the work did not question the reviewer's decision and adjusted the packing". We recognize that the pipefitter and Pipefitter Foreman are not the primary individuals responsible for the pre-planning and interface activities of a particular job, but acknowledge that they should have questioned the MWRTR reviewer's decision.



2. Corrective steps which have been taken and the results achieved:

- a. A review and root cause analysis of the event was performed.
- b. The Pipefitter Foreman held a documented training class with all pipefitters on April 23, 1987 to discuss the importance of proper review and control of maintenance work orders and requirements for post-maintenance testing on AOVs and MOVs.
- c. The Maintenance Manager held a consultation session with those maintenance supervision who review MWRTRs on the importance of control of maintenance activities.
- d. MWRTRs 87-2133 and 87-2167 were performed to assure that the packing adjustment minimized system leakage with CV spray pump discharge pressure applied at MOV 860B, followed by post-maintenance testing per the applicable steps of procedure PT-3, "Containment Spray Pumps and NaOH Additive System". These items were completed on April 10 and May 14, 1987, respectively.
- e. The Maintenance Manager held a briefing session on this subject at the Maintenance Foremen's Meeting of April 23, 1987.

3. Corrective steps which have been or will be taken to prevent recurrence:

- a. A new form for planning, scheduling and coordination of maintenance activities has been generated to aid supervision in addressing the adequacy of maintenance controls. These forms were first distributed within the "Ginna Station Activities Schedule for the Week of 6/1/87 through 6/7/87".



- b. The Ginna Station Maintenance Section has been organized to provide more structure for formally reviewing and controlling maintenance activities performed using the MWRTR. Included in this reorganization is the use of a licensed Senior Reactor Operator to review all MWRTRs for Technical Specifications, implications, operating and planning requirements, and the use of a Quality Control Engineer to review all MWRTRs for applicability of proper Quality Assurance requirements.
 - c. A new MWRTR Form will be prepared, to improve the form for documentation of reviews and control of activities.
 - d. A permanent reorganization of the Ginna Station Maintenance Section.
4. Date when full compliance was achieved:
- a. Full compliance with Technical Specification 6.8.1 was achieved on May 14, 1987, when the valve passed PT-3 satisfactorily.
 - b. Full compliance to implement organizational structure and controls for maintenance activities was completed with the temporary restructuring of the Ginna Station Maintenance Section on May 6, 1987.

The cover letter also requested Rochester Gas and Electric to provide the results of our review on the practices of entering Technical Specification action statements when out-of-specification chemical analysis are obtained. The following is a summary of our results in this review:

We believe that reanalysis of a sample is warranted when preliminary results deviate significantly from the results of prior samples or expected values, especially when dependent parameters have not changed. Resampling and reanalysis are a significant part of the confirmation process in the required supervisory review and acceptance of preliminary data. This is of particular importance, as in this case, where a significant procedural change was made in the analytical process and was being implemented for the first time.



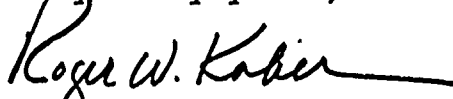
Page 6
Inspection Report 87-18
October 09, 1987

We do not consider confirmatory, assurance of quality actions by the supervisory personnel, required to approve initial grab sample results, as an accepted "grace period". The Corporate and Station Management has a strong commitment, backed up by appropriate administrative controls, to assure strict compliance to Technical Specification requirements in the event of unacceptable results in any surveillance.

The event discussed in this Inspection Report was complicated by the decision to initiate an A-25.1, Ginna Station Event Report. The purpose of initiating the A-25.1 was to ensure that proper plant technical personnel were involved in the assessment of the situation and was not intended to indicate acceptance of the preliminary results. Notification of the Operations personnel of a potential problem with an analysis is a normal laboratory practice, since they are aware of changing plant conditions that can effect the analytical results. This is an important step in determining the validity of the analysis. Normally, the notification and interface with the Control Room personnel have been performed verbally, but in this case an A-25.1 was initiated to assure that all on duty shifts during the reanalysis would be aware of all the facts during the evaluation.

We believe continuation of our required supervisory approval steps in all surveillance is necessary to ensure safe operation of the plant. With the approval authority, comes the responsibility to verify the validity of the results obtained along with the responsibility for prompt assessment of all potential safety concerns using input from all areas of expertise.

Very truly yours,


Roger W. Kober
Vice-President
Electric Production

attachment

xc: Document Control Clerk

RWK:ss

