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 AUTH. NAME AUTHDR AFFILIATION  
 KOBER, R. G. Rochester Gas & Electric Corp.  
 RECIP. NAME RECIPIENT AFFILIATION  
 STAHL, C. NRC - No Detailed Affiliation Given

SUBJECT: Responds to 870824 request for addl info re quality of spent  
 fuel racks fabricated by US Tool & predecessor.

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October 23, 1987

U.S. Nuclear Regulatory Commission  
Document Control Desk  
Attn: Mr. Carl Stahle  
PWR Project Directorate No. 1  
Washington, D.C. 20555

Subject: Quality of Spent Fuel Racks Fabricated by  
U.S. Tool & Die and Predecessor  
R. E. Ginna Nuclear Power Plant  
Docket No. 50-244

Dear Mr. Stahle:

This letter is in response to the request for additional information dated August 24, 1987. The information requested is attached.

RG&E QA/QC personnel conducted several surveillance inspections during the fabrication of the components used for modification of the Ginna spent fuel storage racks. These inspections, in addition to our normal surveillance programs upon receipt and installation of components, provide assurance that the racks satisfy design and regulatory requirements.

Very truly yours,

*Bruce A. Snow for*  
Roger W. Kober

Attachment

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**QUALITY OF SPENT FUEL RACKS  
FABRICATED BY U.S. TOOL AND ITS PREDECESSOR**

**RG&E Response to USNRC Letter Dated August 24, 1987**

This response addresses the work performed by U.S. Tool and Die for Rochester Gas and Electric referenced in the Inspection Report of May 12, 1987.

U.S. Tool and Die was contracted during 1984 to design, fabricate and install inserts for the Ginna spent fuel racks. These inserts contained neutron absorbing materials and were used to modify the existing storage racks to increase storage capacity. Earlier work completed in 1976 is not addressed as the inspection findings would not be relevant to U.S. Tool and Die prior to 1981 when it was under completely different ownership.

The information you requested is delineated following each of the five items of interest.

1. Please describe the extent to which the U.S. Tool and Die QA/QC program was relied upon to assure rack quality.

**RESPONSE**

- a. For the design phase, the U.S. Tool and Die QA program was relied upon. Consistent with established engineering interface practices, a review of drawings and calculations was performed by RG&E engineers. Resulting minor comments to the design documents were incorporated in accordance with the U.S. Tool and Die design change control procedures. In addition, mechanical calculations, seismic calculations and a description of modifications were provided for NRC review as a part of the Technical Specification change approval process.
- b. For the fabrication phase, the U.S. Tool and Die QA/QC program was relied upon to a limited extent to assure quality fabrication. However, in-factory verification of these QA/QC controls was performed by RG&E personnel due to, in part, recognition of a reorganization at that time.
- c. For the installation phase, the U.S. Tool and Die QA/QC program was only relied upon to select and place a contract for work with NPS. NPS's QA program, procedures and personnel were used to execute the work. In addition to program and procedure reviews by RG&E, onsite contract oversight of NPS was provided by RG&E construction, plant and quality control personnel in accordance with established procedures for the control of modifications. Since direct services were not furnished by U.S. Tool and Die for the onsite installation, the concerns of the August 24 letter are not applicable to the installation portion of the purchase order with U.S. Tool and Die.

THE UNITED STATES OF AMERICA  
DO hereby certify that  
[Name] is a citizen of the United States of America.

IN WITNESS WHEREOF, I have hereunto set my hand and seal of office.

Notary Public

My commission expires on [Date]

2. Please describe your in-factory and/or the receipt inspection of the racks.

RESPONSE

Four in-factory inspections were conducted during the fabrication of the rack components. These inspections were performed by qualified RG&E QA and QC personnel and started with receipt of raw material and continued up through final inspection prior to shipment. Each shipment of components was inspected. Inspections for shipping damage were also performed upon receipt at Ginna Station.

The in-factory inspections were performed on 08/03/84, 09/18/84, 09/28/84, and 10/25/84. The inspections included verifications of material traceability, sources of purchased material, material identification, shop fabrication controls, weld procedures, welder qualifications, QA documentation, dimensional inspections, and weld inspections.

3. What findings were made during your receipt inspection of the racks?

RESPONSE

No dimensional, physical or weld problems were found with the rack components during the in-factory inspections or receipt inspections at Ginna Station. Some QA documentation for the material was not available during some of the in-factory inspections, however, the documents were obtained from the material sub-vendors by U.S. Tool and Die prior to receipt of the rack components at Ginna Station.

4. If your receipt inspections found deficiencies in the racks, what corrective actions were taken?

RESPONSE

As stated above no physical deficiencies were found. Missing documents were obtained prior to acceptance of the rack components at Ginna Station.

5. Please describe any additional actions or examinations you plan to undertake to assure that your racks meet the original design and regulatory requirements.

RESPONSE

Based on the verifications performed by our QA/QC organization during fabrication of the rack components, no further actions are deemed necessary.

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