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

ROGER W. KOBER  
VICE PRESIDENT  
ELECTRIC PRODUCTION

TELEPHONE  
AREA CODE 716 546-2700

Ginna Station

October 01, 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 50-244/87-19  
Notice of Violation  
R.E. Ginna Nuclear Power Plant  
Docket No. 50-244

Dear Mr. Russell:

Routine unannounced occupational radiation protection  
Inspection Report 50-244/87-19 states in part:

As a result of the inspection conducted on July 27-31, 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(a) requires, in part,  
that written procedures be established, implemented and  
maintained covering the activities referenced in  
Appendix A of Regulatory Guide 1.33, November 1972.  
One of those activities, procedures for control of  
measuring and test equipment, in Section H of Appendix  
A, Regulatory Guide 1.33, requires that specific  
implementing procedures for each surveillance test,  
inspection or calibration listed in Technical Specifica-  
tions be provided to assure that... instruments...are  
properly controlled, calibrated and adjusted at specified  
periods to maintain accuracy. Table 4.1-3, Accident  
Monitoring Instrumentation Surveillance Requirements,  
of the licensee's Technical Specifications requires  
that a channel calibration of the Containment Area  
High Range Radiation Monitors (R-29 and R-30) be  
performed at each refueling in accordance with criteria  
for calibration provided in Table II.F.1-3 of NUREG-0737.

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PDR ADDCK 05000244  
Q PDR



Contrary to the above, as of July 30, 1987, a procedure was not established and implemented which incorporated all criteria for calibration specified in Table II.F.1-3 of NUREG-0737. Specifically, procedures did not provide for channel calibration of monitors R-29 and R-30 with a source at one point below 10R/hr.

Rochester Gas and Electric Corporation (RG&E) agrees with the violation identified in that Maintenance Calibration Procedure CP-224 "Calibration and/or Maintenance of Containment High Range Area Monitors" was not properly maintained to cover the complete calibration of these instruments in accordance with Table II.F.1-3 of NUREG-0737. Specifically, the steps which require channel calibration using an approved radiation source below 10 R/hr were inadvertently deleted when a Procedure Change Notice (PCN) was submitted to change the Procedure from Revision 3 to Revision 4.

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

1. Corrective steps which have been taken and the results achieved:
  - a. Procedure CP-224 was changed on July 31, 1987 to incorporate the steps required to document the radiation source check steps.
  - b. Revised copy of CP-224 was used and completed for both containment high range radiation monitors on August 12, 1987, with satisfactory results.
2. Corrective steps which will be taken to avoid further violations:
  - a. The change to incorporate the performance of a radiation source check was a permanent change to CP-224 and, therefore, will continue to ensure that these steps are performed and documented.
  - b. A letter has been issued to all plant personnel to stress the importance of a step by step review of all procedure changes to insure that all changes are incorporated properly, and to all Procedure Specialists to stress the importance of routing all permanent procedure changes (other than typographical error corrections) for a step by step review for completeness.



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3. Date when full compliance will be achieved:

Documentation of the source check of the high range containment radiation monitors was achieved upon completion of the revised CP-224 procedure on August 12, 1987.

Very truly yours,

*Bruce A. Snow for*  
Roger W. Kober  
Vice President  
Electric Production

xc: Document Control Clerk

RWK:ss

