



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

December 29, 1987

Ginna Station

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

Subject: Establishment and Implementation of a Computerized
Maintenance Information System

R.E. Ginna Nuclear Power Plant, Unit No. 1
Docket No. 50-244

References: Inspection Report 50-244/85-04
Inspection Report 50-244/86-03
Inspection Report 50-244/87-18
SALP Report 50-244/85-99

Dear Mr. Russell:

Rochester Gas and Electric Corporation, in responses submitted to the above referenced NRC Reports, committed to establish and implement a Computerized Maintenance Information System which would provide maintenance planning, scheduling, work control and documentation of equipment maintenance histories. The original MIS commitment stemmed from an IR 50-244/85-04 violation for failure to implement the valve preventive maintenance program.

In our response to IR 50-244/85-04 Ginna Nuclear Power Plant committed to increasing administrative controls of preventive maintenance including valves. Actions implemented are:

1. Established a full time PM coordinator/planner.
2. Organized a corporate task force to evaluate, formulate and recommend a computerized Maintenance Information System.

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3. Developed a new procedurally controlled valve preventive maintenance program based on Ginna valve history, testing results, and commercial concerns that specifies frequency and tasks (e.g. inspection, testing, maintenance or replacement).

Rochester Gas and Electric has taken or is presently taking the following actions in the continuing development of a Computerized Maintenance Information System:

1. Ginna Station hired a consultant in June, 1986 with industry experience to assist the Maintenance Manager in developing user needs, objectives and goals.
2. Ginna Station committed to perform a Maintenance Self Assessment (MSA) against INPO Guidelines 85-038, "Guidelines for Conduct of Maintenance at Nuclear Power Stations".
3. Ginna Station is currently using the existing MIS to track all Maintenance Work Requests and Trouble Reports to identify the maintenance backlog and to document equipment maintenance histories.
4. Rochester Gas and Electric has assessed similar MIS usage and development at two other utilities within Region I.
5. Rochester Gas and Electric is currently performing a plant component data base needs assessment study to define integrated needs of both Ginna Station and the Engineering Department.
6. Rochester Gas and Electric is currently investigating the requirements of both Reliability Centered Maintenance and Plant Life Extension Programs.

Upon accumulation of recommendations resulting from both the MSA and plant component data base study, Rochester Gas & Electric will formulate a revised computerized information system which will be utilized as an administrative tool to improve our maintenance program. However, our enhanced procedural controls coupled with proper Ginna maintenance section staffing and accountability will control maintenance activities by either manual or electronic means. We are committed to completing the research and continuing the development needed to acquire and use an information system to assist in the performance of our primary mission, which is to maintain our plant in a reliable and safe operational condition.

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A careful analysis of the root cause of the violations and concerns identified in the referenced reports revealed two related administrative deficiencies:

- 1) Inadequate administrative control
- 2) Insufficient review, planning and control of maintenance activities

The following Ginna Station Maintenance Program enhancements have been made to prevent recurrence of the identified program deficiencies and to meet our referenced commitments:

1. Rochester Gas and Electric reorganized and expanded the Ginna Station Maintenance Section with a newly created Planning and Scheduling Branch with the following responsibilities:
 - a. The Planning & Scheduling Branch is responsible for the development and management of a formal Planned Preventive Maintenance Program.
 - b. A Planning & Scheduling sub-group under the leadership of an individual with senior reactor operator experience is responsible for reviewing all corrective Maintenance Work Requests and Trouble Reports (MWRTR) for Technical Specifications applicability, planning, scheduling, and coordinating of corrective maintenance activities.
 - c. The Planning & Scheduling Branch is responsible for conducting weekly planning group meetings and daily maintenance planning presentations at the Morning Operating Priority Activity Report (MOPAR).
2. The Ginna Station Maintenance Section is engaged in the development of a planning, scheduling, and coordination of maintenance activities form to assist in evaluation of corrective MWRTR's.
3. Ginna Station management initiated Q.C. Supervision review of all MWRTR's for Quality Assurance program applicability.

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We believe that the implementation of an expanded and reorganized maintenance organization designed and dedicated to prevent recurrences of the types of deviations identified in the referenced inspection reports, will fulfill our commitments in response to the referenced reports and provide the maintenance controls necessary for safe plant operation.

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

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REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8801200078 DOC. DATE: 87/12/29 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 violations noted in Insp Repts 50-244/85-04,
 50-244/86-03, 50-244/87-18 & SALP Rept 50-244/85-99.
 Corrective actions: reorganization, establishment &
 implementation of computerized maint info sys.

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