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 MECREDY, R.C. Rochester Gas & Electric Corp.  
 RECIP. NAME RECIPIENT AFFILIATION  
 RUSSELL, W.T. Region 1, Ofc of the Director

SUBJECT: Responds to observations & concerns noted in Insp Rept  
 50-244/88-23.

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January 4, 1989

Mr. William T. Russell  
Regional Administrator  
US Nuclear Regulatory Commission  
Region I  
475 Allendale Road  
King of Prussia, PA 19406

SUBJECT: Inspection Report 50-244/88-23  
Response to Observations and Concerns  
R.E. Ginna Nuclear Power Plant  
Docket No. 50-244

Dear Mr. Russell:

In accordance with NRC Inspection Report 88-23, which stated:

"The station stockroom had not conducted an inventory check of safety-related equipment and spare parts in the stockroom. Several such items were below the minimum inventory level required as delineated in the stockroom equipment and spare parts cards, and no actions were taken to replenish them."

"The licensee has not established a list of spare parts and equipment in the stockroom requiring preventive maintenance (PM), the procedures for performing PM, and a PM schedule." (50-244/88-23-01)

"Some QA hold items were found not segregated from the new consignments in the station receiving area." (50-244/88-23-02)

"The QC semi-annual surveillance reports (1988) reviewed did not sufficiently document the scope and the surveillance activities performed." (50-244/88-23-03)

The following is provided in response:

In response to the issue regarding the lack of an inventory check and the lack of action to replenish stock that has fallen below minimum stock levels, we believe the concern to be in error. An

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in-depth inventory of all stock items was completed in September, 1988 and all associated hard copy and computer records were updated to reflect the current status of inventory at that time. On-going efforts are being continued in order to maintain the proper status of inventory. In reference to the lack of action to replenish stock, as communicated to the inspector during the exit, further observation of the inventory system revealed that all items listed by the inspector on Attachment #1 of the Inspection Report (and additional items indicated during the inspection) were all found to have been properly addressed and on order through the procurement process system. Consequently action was in progress on all items identified that were at the reorder point. See Attachment #1 for further detail.

At present it is felt that no action is necessary to address this issue. However, Rochester Gas & Electric will continue to monitor this area and plans to continue with an overall improvement program, which includes thorough updating of equipment and part information records, material handling equipment and inventory tracking methods.

#### Unresolved Item 88-23-01 Preventive Maintenance of Stored Items

Rochester Gas and Electric agrees with the stated unresolved item. Corrective Action Report (CAR-1833) had been issued to address the preventive maintenance of certain electrical items such as power supplies. A strengthened effort is being put forth to further address CAR-1833 with a meeting scheduled during January, 1989. In addition, Corrective Action Report (CAR-1931) has been issued to address the establishment of a PM program for stored items, including an overall list, procedures, and a PM schedule for the targeted items.

#### Unresolved Item 88-23-02 QA Hold Items Not Segregated

We believe the statement in the Inspection Report, "Some QA items were not segregated from the new consignments marked for QC inspection, in accordance with the requirements of ANSI N45.2.2-1972" to be in error. A review of ANSI N45.2.2-1972 was performed to compare the standard against RG&E's current method of segregating materials. It is felt that Rochester Gas & Electric is in full compliance with the ANSI standard. At present, a locked and controlled access Hold Area is contained within the Receiving Facility. All incoming safety related items are hold-tagged and placed within the confines of the Hold Area (unless size deems it not practical to do so). All incoming hold-tagged items are kept restricted to the Hold Area until final acceptance is accomplished. This process is used for new incoming items not yet inspected, and items that have already been inspected and are pending resolution of discrepancies for acceptance. Upon proper accept-



ance the segregated items are Accept-tagged, removed from the Hold Area and placed into storage or use.

The inspector makes reference to certain items on hold that were kept in the "receiving area". Potentially there could be confusion as to the "receiving area" and the Hold Area which is a locked, separate, segregated room within the Receiving Building. No hold-tagged items are kept in the receiving area and all items on hold are restricted to the Hold Area unless size dictates otherwise, at which point the items are relegated to a locked-access warehouse pending acceptance.

We feel no action is necessary to address this item, however we will continue to seek improvement in our present method of addressing items on Hold.

#### Unresolved Item 88-23-03 Insufficient Documentation of Stockroom Surveillance

Rochester Gas & Electric acknowledges an incident of insufficient documentation regarding the scope and surveillance of stockroom activities but does not feel a generic issue is at hand. RG&E's standard method for performing scheduled surveillances is to utilize a checklist and then summarize the results on a surveillance report used as a coversheet. An analysis of all scheduled surveillances for 1988 was performed with the results indicating that all surveillances, except one, were performed to a checklist. The one exception was performed with the assistance of an attached procedure and the adequacy of the activities was verified on the coversheet surveillance report. It is felt that the intent of the surveillance was met, however, Rochester Gas & Electric concurs that the use of a checklist for scheduled surveillance is necessary and the Quality Group has reaffirmed that fact, in writing, to the proper personnel.

#### Other Concerns and Observations

The inspector identified other concerns and observations such as the fact that the computer system for inventory control is not very useful, the control of material handling equipment is inadequate, rotation of stock for "first-in-first-out" philosophy is not properly addressed, and tagging deficiencies were identified. Lack of equipment control and retrievability were evident as well as the lack of proper inspection, control, and verification of stockroom inventory. It was also identified that hold-log entries were inconsistent, and QA audits lack in-depth review and verification. Rochester Gas & Electric agrees that the inventory control system requires additional improvement and will implement an improvement program to update and strengthen its Storehouse Operations activities. The improvement program will include a





thorough review and update of all part records and information, material handling equipment and inventory tracking methods.

It is recognized that materials on QA Hold must be dispositioned in a more timely manner and that the Hold Log entries must be consistent, consequently the Quality Control organization will initiate a program to strengthen this area. Additionally, in response to the inspector's observation, the Plant Manager will address the Engineering Department and Maintenance Department regarding the potential delay in disposition of these materials.

The inspector determined that QA audits lack in-depth review and verification of the stockroom activities. The licensee QA group presently conducts audits of the station activities of receipt, storage and handling of equipment and materials at Ginna, on a yearly basis. The QA group will review present checklists, criteria, and documentation for stockroom activity audits, and strengthen as necessary so that a proper in-depth review and verification process can be accomplished.

The date by which the above described activities will be addressed is December 31, 1989.

Very truly yours,



Robert C. Mecredy  
General Manager  
Nuclear Production

xc: U.S. Nuclear Regulatory Commission (original)  
Document Control Desk  
Washington, D.C. 20555

Ginna NRC Senior Resident Inspector



ATTACHMENT 1

The below items were referenced either in the Inspection Report or by the inspector during the exit, as items that no action had been taken to replenish. The last column is provided by RG&E and lists the purchase order number that the subject items are being, or have been, replenished on. Please note that all purchase orders referenced were on site and available at the time of the inspection.

<u>RG&amp;E #</u>	<u>Description</u>	<u>Available</u>	<u>Minimum</u>	<u>Purchase Order #</u>	<u>Issued</u>
5427	Diaphragm	1	3	NQ-11194-B-JD	10-10-88
6008	Packing	1	2	NQ-11217-B-JD	11-10-88
9341	3-Valve Manifold	0	1	NQ-11225-B-JD	09-03-88
1003	3/4" Globe Valve	5	6	NQ-10188-B-JD	**06-17-86
7021	Marker	0	10	NQ-10689-B-JM	*07-22-87
7023	Marker	0	10	NQ-10689-B-JM	*07-22-87
7027	Marker	0	10	NQ-10689-B-JM	*07-22-87

All items had action initiated prior to issuance of P.O.

\* All items on PO received except these (vendor inquiries made)

\*\* Material received 12/88

2-1-1

