

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

TELEPHONE
AREA CODE 716 546-2700

January 27, 1989

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

Subject: Inspection Report 50-244/88-24
Notice of Violation
R.E. Ginna Nuclear Power Plant
Docket No. 50-244
License No. DPR-18

Dear Mr. Russell:

Your letter of December 29, 1988, from Mr. Jacque P. Durr regarding Inspection Report No. 50-244/88-24, Transmittal Notice of Violation, Appendix A, which identified two violations, 88-24-01, and 88-24-03.

Rochester Gas and Electric, after performing investigations and/or analysis, during and subsequent to the inspection, concur with the violations as stated.

Violation 88-24-01

Routine Inspection Report 50-244/88-24, Appendix A, Notice of Violation, states in part:

"10 CFR 50, Appendix R, Section III.G requires that fire protection features be provided to safe shutdown components so that one train of systems required to achieve hot shutdown is free of fire damage. One method of ensuring that one of the redundant trains remains free of fire damage is the enclosure of cables and equipment in a fire barrier having a one hour rating.

882030232 4pp



Page 2
Mr. William T. Russell
January 27, 1988

Contrary to the above, as a result of an inspection conducted on September 8-22, 1988, it was determined that the redundant train that provides steam generator pressure indication would not be free of damage by fire in the Intermediate Building, elevation 253'-6". Also, the redundant train that provides primary coolant make up would not be free of damage from a fire in the Auxiliary Building, Fire area ABBM. These redundant safe shutdown trains would be damaged by fire because the one hour fire barrier provided for cable enclosure was improperly installed. The improperly installed fire barrier was the one hour rated fire wrap which protects conduit R975 for steam generator pressure indication and the fire wrap of conduits L400 and L398 required for the operation of charging pump 1A".

Reason of Violation:

The one hour conduit fire wrap was procured as a proprietary system to be installed under vendor supervision. The installation specification was written by the vendor with a Ginna site specific addendum added by RG&E. The intent of the installation specification was for all interferences to be wrapped with a four inch extension or totally encapsulated. Addendum 1 to the specification stated that all supports and interferences shall be protected a minimum of four inches measured linearly from the structure being protected. Diagrams of a cable tray wrapped in this manner are shown in the specification. One vendor supervisor used the specification as intended and the wrap installed under his supervision was adequate. The other vendor supervisor did not understand the physical processes involved in heat transfer through the supports and interferences and interpreted the specification to require that only the four inch of wrap around the conduit would provide four linear inches of wrap from the conduit. The supports wrapped under his supervision were in most cases not adequate to protect the conduit for one hour of the ASTM E119 fire. Three specific causes for this occurrence are:

1. Lack of training of vendor supervisor in basic physical processes involved in the installation.
2. Lack of sufficient margin in the vendors design to accommodate diverse raceway support configurations found in the field.
3. Lack of discussion in the installation specification as to the reason for providing insulation extension along supports and interferences.



Page 3
Mr. William T. Russell
January 27, 1989

Corrective Steps Taken and Results Achieved:

The subject conduit supports are being rewrapped to provide full one hour protection for the ASTM E119 fire.

Corrective Steps Taken to Prevent Future Occurrences:

1. The installation specification has been revised to require the equivalent of twelve inches of insulation along supports and interferences in future installations. This provides sufficient margin to assure the one hour rating.
2. Analytical methods have been developed to evaluate any configurations where twelve inches cannot be achieved.

Date When Full Compliance Will Be Achieved:

All rewapping will be complete by February 15, 1989.

Violation 88-24-03

Routine Inspection Report 50-244/88-24, Appendix A, Notice of Violation, states in part:

License Condition C.(3) Fire Protection, requires that the licensee maintain in effect all fire protection features described in the NRC's Fire Protection Safety Evaluation (SE) dated February 14, 1979. The SE in paragraph 3.1.31 requires that quarterly fire drills be conducted for each shift brigade and in paragraph 6.2 it requires that the quarterly drills be preplanned.

Contrary to the above, on November 15-17, 1988, it was determined that the licensee did not perform preplanned fire drills quarterly for all shift brigades. In the first quarter of 1988, four out of five shift brigades did not attend a preplanned fire drill, in the second quarter two out of five shift brigades did not participate in a preplanned fire drill, and in the third quarter, three out of six shift brigades did not participate in a preplanned fire drill.



Page 4
Mr. William T. Russell
January 27, 1989

Reason for Violation:

RG&E was taking credit for actual fire brigade response to fire alarms. This practice was considered acceptable since critiques were conducted by the Brigade Leader following each credited response. Additionally, each alarm response report was reviewed quarterly with all brigade members to discuss alarm response protocols. Under these auspices, each brigade did meet the quarterly training requirements. However, since the alarm responses could not be preplanned as required, drill credit would appear questionable and inconsistent with requirements.

Corrective Steps Taken and Results Achieved:

Remedial steps taken were to schedule and conduct preplanned fire drills for all shifts in the last quarter of 1988.

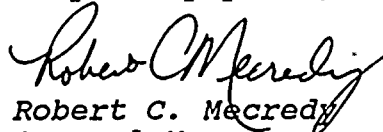
Corrective Steps Taken to Prevent Future Occurrences:

Administrative Procedure A-103.9, "Fire Brigade Training", has been changed to require all fire drills to be preplanned and to delete the step taking credit for fire alarms as fire drills.

Date When Full Compliance Will Be Achieved:

Full compliance was achieved during last quarter of 1988.

Very truly yours,


Robert C. McCreedy
General Manager
Nuclear Production

xc: U.S. Nuclear Regulatory Commission (Original)
Document Control Desk
Washington, DC 20555

Ginna Station NRC Senior Resident Inspector



ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

CESSION NBR:8902030232 DOC.DATE: 89/01/27 NOTARIZED: NO DOCKET #
 FACIL:50-244 Robert Emmet Ginna Nuclear Plant, Unit 1, Rochester G 05000244
 AUTH.NAME AUTHOR AFFILIATION
 MECREDY,R.C. Rochester Gas & Electric Corp.
 RECIP.NAME RECIPIENT AFFILIATION
 RUSSELL,W.T. Region 1, Ofc of the Director

SUBJECT: Responds to NRC 881229 ltr re violations noted in Insp Rept 50-244/88-24.

DISTRIBUTION CODE: IE01D COPIES RECEIVED:LTR 1 ENCL 1 SIZE: 4
 TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

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

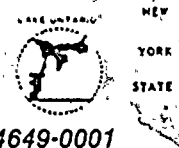
	RECIPIENT		COPIES			RECIPIENT		COPIES		
	ID CODE/NAME		LTTR	ENCL		ID CODE/NAME		LTTR	ENCL	
	PD1-3 PD		1	1		STAHL,C		1	1	/
INTERNAL:	AEOD		1	1		AEOD/DEIIB		1	1	R
	DEDRO		1	1		NRR SHANKMAN,S		1	1	I
	NRR/DEST DIR		1	1		NRR/DLPQ/PEB 11		1	1	D
	NRR/DLPQ/QAB 10		1	1		NRR/DOEA DIR 11		1	1	D
	NRR/DREP/EPB 10		1	1		NRR/DREP/RPB 10		2	2	S
	NRR/DRIS DIR 9A		1	1		NRR/PMAS/IIRB12		1	1	
	NUDOCS-ABSTRACT		1	1		OF LIEBERMAN,J		1	1	
	OGC/HDS2		1	1		REG FILE	02	1	1	
	RGN1 FILE 01		1	1						
EXTERNAL:	LPDR		1	1		NRC PDR		1	1	
	NSIC		1	1						

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK,
 ROOM P1-37 (EXT. 20079) TO ELIMINATE YOUR NAME FROM DISTRIBUTION
 LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 23 ENCL 23





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

TELEPHONE
AREA CODE 716 546-2700

January 27, 1989

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

Subject: Inspection Report 50-244/88-24
Notice of Violation
R.E. Ginna Nuclear Power Plant
Docket No. 50-244
License No. DPR-18

Dear Mr. Russell:

Your letter of December 29, 1988, from Mr. Jacques P. Durr regarding Inspection Report No. 50-244/88-24, Transmittal Notice of Violation, Appendix A, which identified two violations, 88-24-01, and 88-24-03.

Rochester Gas and Electric, after performing investigations and/or analysis, during and subsequent to the inspection, concur with the violations as stated.

Violation 88-24-01

Routine Inspection Report 50-244/88-24, Appendix A, Notice of Violation, states in part:

"10 CFR 50, Appendix R, Section III.G requires that fire protection features be provided to safe shutdown components so that one train of systems required to achieve hot shutdown is free of fire damage. One method of ensuring that one of the redundant trains remains free of fire damage is the enclosure of cables and equipment in a fire barrier having a one hour rating.

8902030232 890127
PDR ADUCK 05000244
C FDC

TEO/
11



Page 2

Mr. William T. Russell.
January 27, 1988

Contrary to the above, as a result of an inspection conducted on September 8-22, 1988, it was determined that the redundant train that provides steam generator pressure indication would not be free of damage by fire in the Intermediate Building, elevation 253'-6". Also, the redundant train that provides primary coolant make up would not be free of damage from a fire in the Auxiliary Building, Fire area ABBM. These redundant safe shutdown trains would be damaged by fire because the one hour fire barrier provided for cable enclosure was improperly installed. The improperly installed fire barrier was the one hour rated fire wrap which protects conduit R975 for steam generator pressure indication and the fire wrap of conduits L400 and L398 required for the operation of charging pump 1A".

Reason of Violation:

The one hour conduit fire wrap was procured as a proprietary system to be installed under vendor supervision. The installation specification was written by the vendor with a Ginna site specific addendum added by RG&E. The intent of the installation specification was for all interferences to be wrapped with a four inch extension or totally encapsulated. Addendum 1 to the specification stated that all supports and interferences shall be protected a minimum of four inches measured linearly from the structure being protected. Diagrams of a cable tray wrapped in this manner are shown in the specification. One vendor supervisor used the specification as intended and the wrap installed under his supervision was adequate. The other vendor supervisor did not understand the physical processes involved in heat transfer through the supports and interferences and interpreted the specification to require that only the four inch of wrap around the conduit would provide four linear inches of wrap from the conduit. The supports wrapped under his supervision were in most cases not adequate to protect the conduit for one hour of the ASTM E119 fire. Three specific causes for this occurrence are:

1. Lack of training of vendor supervisor in basic physical processes involved in the installation.
2. Lack of sufficient margin in the vendors design to accommodate diverse raceway support configurations found in the field.
3. Lack of discussion in the installation specification as to the reason for providing insulation extension along supports and interferences.



Page 3
Mr. William T. Russell
January 27, 1989

Corrective Steps Taken and Results Achieved:

The subject conduit supports are being rewrapped to provide full one hour protection for the ASTM E119 fire.

Corrective Steps Taken to Prevent Future Occurrences:

1. The installation specification has been revised to require the equivalent of twelve inches of insulation along supports and interferences in future installations. This provides sufficient margin to assure the one hour rating.
2. Analytical methods have been developed to evaluate any configurations where twelve inches cannot be achieved.

Date When Full Compliance Will Be Achieved:

All rewapping will be complete by February 15, 1989.

Violation 88-24-03

Routine Inspection Report 50-244/88-24, Appendix A, Notice of Violation, states in part:

License Condition C.(3) Fire Protection, requires that the licensee maintain in effect all fire protection features described in the NRC's Fire Protection Safety Evaluation (SE) dated February 14, 1979. The SE in paragraph 3.1.31 requires that quarterly fire drills be conducted for each shift brigade and in paragraph 6.2 it requires that the quarterly drills be preplanned.

Contrary to the above, on November 15-17, 1988, it was determined that the licensee did not perform preplanned fire drills quarterly for all shift brigades. In the first quarter of 1988, four out of five shift brigades did not attend a preplanned fire drill, in the second quarter two out of five shift brigades did not participate in a preplanned fire drill, and in the third quarter, three out of six shift brigades did not participate in a preplanned fire drill.



Page 4
Mr. William T. Russell
January 27, 1989

Reason for Violation:

RG&E was taking credit for actual fire brigade response to fire alarms. This practice was considered acceptable since critiques were conducted by the Brigade Leader following each credited response. Additionally, each alarm response report was reviewed quarterly with all brigade members to discuss alarm response protocols. Under these auspices, each brigade did meet the quarterly training requirements. However, since the alarm responses could not be preplanned as required, drill credit would appear questionable and inconsistent with requirements.

Corrective Steps Taken and Results Achieved:

Remedial steps taken were to schedule and conduct preplanned fire drills for all shifts in the last quarter of 1988.


Corrective Steps Taken to Prevent Future Occurrences:

Administrative Procedure A-103.9, "Fire Brigade Training", has been changed to require all fire drills to be preplanned and to delete the step taking credit for fire alarms as fire drills.

Date When Full Compliance Will Be Achieved:

Full compliance was achieved during last quarter of 1988.

Very truly yours,


Robert C. McCreedy
General Manager
Nuclear Production

xc: U.S. Nuclear Regulatory Commission (Original)
Document Control Desk
Washington, DC 20555

Ginna Station NRC Senior Resident Inspector

