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SUBJECT: Interim Part 21 rept re deficiencies w/MOVs V826B, V738B & V871A & two two inch Velan manual 1500 ASME Class II valves. Further investigation being conducted by noncompliance repts processing group.

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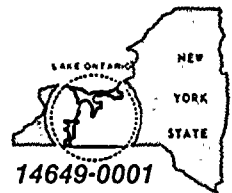
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March 23, 1992

U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

Subject: 10 CFR Part 21 Interim Report
R. E. Ginna Nuclear Power Plant
Docket No. 50-244

The revision to 10 CFR Part 21, Section 21(a) made effective on 10/29/91, requires an interim report of any deviation for which an evaluation to determine reportability impact is unable to be completed within 60 days of discovery.

A recent RG&E audit found that evaluations for several deviations were not timely and that the need for interim reports had not yet been considered. It further determined the cause of the problem to be implementation deficiencies corresponding to the rule change.

The magnitude of the problem was 28 evaluations exceeding the 60 day duration. This total was derived from an audit sample, from the nearly 200 open Nonconformance Reports (NCR) and further investigation by the NCR processing group. During the past four weeks a concerted effort was undertaken to complete the 28 evaluations. The following tabulation presents the current status:

- Evaluation Completed -- No Reportable Defect -- 25
- Evaluation In Progress -- Included in Interim Report -- 2
- Evaluation Completed -- Reportable Defect -- 1 *

* Notice dated February 24 sent by facsimile

The two deviations requiring additional evaluation time are described in Attachment A. The actual discovery date for each preceded the rule change that became effective 10/29/91. For these deviations, the 10/29/91 date which augments the actual discovery date was used to initiate the 60 day evaluation requirement. Although these deviations were discovered prior to the rule change date, interim reports became necessary prior to 12/28/91 for evaluations continuing into 1992.

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In addition to the review of NCRs, other corrective action systems which involve evaluations under 10 CFR Part 21 have also been reviewed and found to be free of timeliness problems.

The following actions have been undertaken to ensure timely evaluation and interim reporting in the future.

1. Assigned responsibilities and methods for processing and statusing deviations have been clarified in all applicable procedures, including Ginna Station and Quality Performance.
2. Assigned responsibilities and instructions for performing 10 CFR 21 evaluations and related interim reports have been clarified in existing Ginna Station, Quality Performance and Nuclear Engineering Services procedures. These clarifications include utilization of 10CFR 50.72 and 50.73 criteria for performing evaluations of installed basic components.
3. Responsibilities and requirements for 10 CFR 21 evaluations and related interim reports have been clarified in relevant portions of Quality Assurance Manual Sections 15 and 16.
4. Target completion dates are assigned and tracked for potential deviations to assure timely evaluations.
5. Training has been scheduled for appropriate groups. In the interim, closer monitoring of the evaluation timeliness will be provided by the Quality Performance department.

In summary, corrective actions are sufficiently implemented to assure timely evaluation of 10 CFR 21 deviations. Interim actions will remain until required training is completed. Further correspondence on the 2 items described in Attachment A will not be issued unless the evaluations are not completed as scheduled or the deviations require reporting per 10 CFR Part 21.

Very Truly Yours,


Robert C. Mecredy

RCM\cem\005

xc: Regional Administrator
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Attachment A

10 CFR 21 Deviation Evaluation Extensions

Deviation

Discovery Date: 5/10/91 (10/29/91)

Description: Several deficiencies with motor operated valves were noted as follows when test data was compared with calculations:

- * V826B - Measured thrust exceeded calculated weak link thrust.
- * V738B - Calculated dp thrust exceeds thrust measured by a static test.
- * V871A - Measured thrust in differential pressure test exceeds calculated motor stall thrust.

Valves have been found to be acceptable for interim use until further testing or repair is performed. (NCR 91-362)

Scheduled Evaluation Completion Date: 7/15/92

Deviation

Discovery Date 8/21/91 (10/29/91)

Description: During receipt inspection, two two inch Velan manual 1500 # ASME Class II valves were identified with gouges. Valves are not installed in the plant. Depth and significance of gouges are being evaluated. (NCR 91-481)

Scheduled Evaluation Completion Date: 7/15/92

