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 MECREY,R.C. Rochester Gas & Electric Corp.
 RECIP.NAME RECIPIENT AFFILIATION
 JOHNSON,A.R. Project Directorate I-3

SUBJECT: Responds to NRC ltr re violations noted in insp rept
 50-244/94-05 on 940208-0308. Corrective actions:calibr of
 containment pressure transmitters has been changed to use
 gas instead of water.

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ROBERT C. MECREDDY
Vice President
Ginna Nuclear Production

TELEPHONE
AREA CODE 716 546-2700

May 6, 1994

U.S. Nuclear Regulatory Commission
Document Control Desk
Attn: Allen R. Johnson
PWR Project Directorate I-3
Washington, D.C. 20555

Subject: Reply to a Notice of Violation
50-244/94-05-01,
dated April 6, 1994
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Johnson:

During an NRC inspection conducted on February 8, 1994 to March 8, 1994, one violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below:

10 CFR 50, Appendix B, Criterion XI, "Test Control," states, in part: "A test program shall be established to assure that all testing required to demonstrate that structures, systems, and components will perform satisfactorily in service is identified and performed in accordance with written test procedures which incorporate the requirements and acceptance limits contained in applicable design documents."

Contrary to the above, two conditions were identified that demonstrated that testing was not being appropriately performed. Specifically:

On February 15, 1994, it was determined that the two manual containment isolation pushbuttons had not been periodically tested each refueling outage as required by Technical Specification Table 4.1.2 item 9.

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On March 4, 1994, the licensee determined that containment pressure (P) channels P-947 and P-948 had been inoperable since June 1992, due to an obstruction in the common containment pressure sensing line for the pressure transmitters (PT)-947 and PT-948. The monthly channel functional test and annual channel calibration, as required by Technical Specification Table 4.1-1, items 17 and 25, associated with these channels, did not detect the obstructed tubing due to the obstruction being located in an untested section of the pressure sensing line between the open end in the containment vessel and the root isolation valves for PT-947 and PT-948.

The response to the violation is provided separately for each of the two conditions stated.

A. Response for Containment Isolation Pushbuttons

- (1) the reason for the violation, or, if contested, the basis for disputing the violation:

Rochester Gas & Electric Corporation (RG&E) accepts the violation, and acknowledges that our test program did not test the entire manual Containment Isolation circuitry each refueling outage, as required by Technical Specification Table 4.1-2, item 9.

RG&E formed a Technical Specification Review Team as a result of LER 93-005. (Refer to Ginna Docket No. 50-244, LER 93-005.) This review team was tasked with the responsibility of identifying and reviewing procedures which implement Technical Specification surveillance requirements to assure all Section 4 test requirements were properly implemented. This review team identified a deficiency in that the Containment Isolation pushbuttons are not functionally tested each refueling outage.

Upon self-identification of the omitted surveillance, the untested Containment Isolation pushbutton was immediately declared inoperable, and the appropriate Limiting Condition for Operation (LCO) was entered.

- (2) the corrective steps that have been taken and the results achieved:

Procedure RSSP-2.1, "Safety Injection Functional Test", has been upgraded to formally document the testing of both manual Containment Isolation pushbuttons.

This test was successfully conducted on April 7, 1994, and will be performed at the frequency required by Technical Specifications.

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- (3) the corrective steps that will be taken to avoid further violations:

Since the omitted surveillance was identified as a direct result of the programmatic review of the entire Technical Specification Section 4 surveillance requirements, no additional corrective steps will be required to avoid further violations.

- (4) the date when full compliance will be achieved:

The Containment Isolation pushbuttons were tested on April 7, 1994. Full compliance was achieved at the completion of this testing.

B. Response for Containment Pressure Channels

- (1) the reason for the violation, or, if contested, the basis for disputing the violation:

RG&E accepts the violation, and acknowledges that our test program did not detect the obstructed tubing, which was caused by rust accumulation. This was an isolated case, resulting from water being retained following transmitter calibration.

Testing and calibration of the associated valves and transmitters is normally performed to meet 10CFR50 Appendix J, ASME, and Technical Specifications requirements. However, none of these tests or calibrations were designed to detect an obstruction in the passive tubing from the penetration to the root valve.

The obstructed tubing was self-identified through a questioning attitude and aggressive follow-through from RG&E employees. Prompt corrective actions were undertaken upon identification of the problem.

It should be noted that RG&E was in the process of revising the test procedures when this condition was identified. The enhanced test procedure would have identified the obstructed tubing. The enhancement was underway as part of our continuing effort to improve test processes and procedures.

- (2) the corrective steps that have been taken and the results achieved:

The method of calibration of the Containment pressure transmitters has been changed to use gas (instead of water) as the test medium. These revised procedures were used to perform calibrations of the Containment pressure channels during the 1994 refueling outage. Continued use of gas as test medium will eliminate the potential for obstructions caused by rusting of the pressure sensing tubing.

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Test procedures were enhanced to detect any obstructions in the previously untested pressure tubing. The enhanced test procedures were utilized during the 1994 refueling outage with satisfactory results.

Similar penetrations were inspected during the 1994 refueling outage, and no other instances of rust were identified.


- (3) the corrective steps that will be taken to avoid further violations:

This was confirmed to be an isolated case. Because the affected calibration and test procedures have been enhanced, no additional corrective steps will be required to avoid further violations.

- (4) the date when full compliance will be achieved:

Full compliance was achieved on February 4, 1994, when P-947 and P-948 were declared operable. (Refer to Ginna Docket No.50-244, LER 94-002, for details.)

Very Truly Yours,


Robert C. Mecredy

xc: Mr. Allen R. Johnson (Mail Stop 14D1)
PWR Project Directorate I-3
Washington, D.C. 20555

U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

Ginna USNRC Senior Resident Inspector