



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



AREA CODE 716 546-2700

ROBERT C. MECREDDY
Vice President
Nuclear Operations

February 9, 1995

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
NRC Inspection Report 50-244/94-27-01,
dated January 10, 1995
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Johnson:

During NRC inspections conducted on November 22 to December 31, 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 V, "Instructions, Procedures, and Drawings," states, in part: "Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished."

"Contrary to the above, as part of a modification to the Service Water system to upgrade the C-Service Water pump discharge check valve, V-4603, performed during the period September 29 - October 4, 1994, work instructions contained in station modification procedure SM-5284B.2, "C-Service Water Pump Check Valve 4603 Modification," did not include appropriate quantitative or qualitative acceptance criteria to ensure that the previously in-use expansion joint between the C-Service Water pump discharge and V-4603 would fit properly following completion of the check valve modification. As a result, installation caused the expansion joint to be stretched by an amount that was in excess of the manufacturer's maximum allowable value, which subsequently caused the pressure retaining capability of the expansion joint to be degraded."

~~750 2150273~~



- (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 offers the following information which contributed to the violation.

The activities involving replacement of check valve V-4603 contributed to the violation. The replacement of the check valve was not expected to alter the face-to-face flange dimensions at the expansion joint (SSW04). Therefore, the planning package for the modification did not consider the need to specify quantitative or qualitative acceptance criteria for the expansion joint.

During earlier activities related to replacement of the expansion joints for the "A" and "B" Service Water pumps during the 1994 outage, nonconforming conditions were identified, and documented on a Nonconformance Report (NCR). However, the corrective action rework resulting from this earlier NCR were not recognized as applicable to future work. This was a missed opportunity to convert the lessons learned from the "A" and "B" expansion joint conditions into upgraded technical process controls for the "C" Service Water expansion joint work. It is noteworthy to mention that the design allowable elongation of this expansion joint is 3/8 inch, a small fraction of the overall length of the expansion joint, which is between approximately ten inches.

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

Upon discovery of this condition, the manufacturer was consulted. Based on evaluations and subsequent field inspection by the manufacturer, it was concluded that degradation that occurred did not affect system operability. However, the design maximum pressure-retaining capability had been compromised, though the joints were still able to meet the service requirements of the Service Water system. This condition was then documented as a nonconforming condition on NCR 94-128, and was justified for interim use, based on the manufacturer's assessment.

A replacement expansion joint, designed to the specific flange-to-flange dimensions, was procured. RG&E elected to replace the joint upon receipt of the newly procured expansion joint. After replacement on December 28, 1994, the expansion joint was within the manufacturer's installation criteria, including full elongation capability.

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

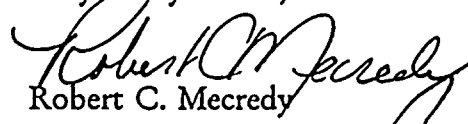
- A new maintenance procedure (GMP-11-14-01) is being developed. GMP-11-14-01 will provide instructions for installation of the Service Water pump discharge expansion joints, including quantitative or qualitative acceptance criteria.
- The controls for installation of the new check valve for the "D" Service Water pump discharge (the remaining unmodified pump discharge check valve) will include engineering controls for the installation of the expansion joint, as an integral part of the modification. The modification procedure will contain appropriate acceptance criteria for the expansion joint.
- An investigation will be performed to assess similar applications of expansion joints in the plant, and will include an evaluation of engineering, procurement, vendor issues, work package preparation, alignment of management expectations with predetermined acceptance criteria, and administrative controls. The objective of this investigation is to identify the need for quantitative or qualitative acceptance criteria for other applications.
- Mechanical maintenance personnel will be trained on new procedure GMP-11-14-01, prior to use.

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

Full compliance with the configuration of the "C" SW pump expansion joint was achieved on December 28, 1994, when the replacement joint was installed.

Full compliance with quantitative or qualitative acceptance criteria for Service Water system expansion joints will be achieved with the approval of procedure GMP-11-14-01. This procedure will be approved prior to completion of the 1995 outage.

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



PRIORITY 1
(ACCELERATED RIDS PROCESSING)

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9502150373 DOC.DATE: 95/02/09 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
JOHNSON, A.R. Project Directorate I-3 (PD1-3) (Post 941001)

SUBJECT: Responds to NRC 950110 ltr re violation noted in insp rept
50-244/94-27 on 941122-1231. Corrective actions: replacement
expansion joint, designed to specific flange-to-flange
dimensions procured & installed on 941228.

DISTRIBUTION CODE: IE01D COPIES RECEIVED: LTR 1 ENCL 0 SIZE: 3
TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

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

	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
	PD1-3 PD	1 1	JOHNSON, A	1 1
INTERNAL:	AEOD/DEIB	1 1	AEOD/SPD/RAB	1 1
	AEOD/SPD/RRAB	1 1	AEOD/TTC	1 1
	DEDRO	1 1	FILE-CENTER 02	1 1
	NRR/DISP/PIPB	1 1	NRR/DORS/OEAB	1 1
	NRR/DRCH/HHFB	1 1	NUDOCS-ABSTRACT	1 1
	OE DIR	1 1	OGC/HDS3	1 1
	RGN1 FILE 01	1 1		
EXTERNAL:	LITCO BRYCE, J H	1 1	NOAC	1 1
	NRC PDR	1 1		

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL
DESK, ROOM P1-37 (EXT. 504-2083) TO ELIMINATE YOUR NAME FROM
DISTRIBUTION LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 18 ENCL ~~18~~ 0





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



AREA CODE 716 546-2700

ROBERT C. MECREDY
Vice President
Nuclear Operations

February 9, 1995

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
NRC Inspection Report 50-244/94-27-01,
dated January 10, 1995
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Johnson:

During NRC inspections conducted on November 22 to December 31, 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 V, "Instructions, Procedures, and Drawings," states, in part: "Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished."

"Contrary to the above, as part of a modification to the Service Water system to upgrade the C-Service Water pump discharge check valve, V-4603, performed during the period September 29 - October 4, 1994, work instructions contained in station modification procedure SM-5284B.2, "C-Service Water Pump Check Valve 4603 Modification," did not include appropriate quantitative or qualitative acceptance criteria to ensure that the previously in-use expansion joint between the C-Service Water pump discharge and V-4603 would fit properly following completion of the check valve modification. As a result, installation caused the expansion joint to be stretched by an amount that was in excess of the manufacturer's maximum allowable value, which subsequently caused the pressure retaining capability of the expansion joint to be degraded."

9502150373 950209
PDR ADOCK 05000244
Q PDR

TEO/
1/0



- (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 offers the following information which contributed to the violation.

The activities involving replacement of check valve V-4603 contributed to the violation. The replacement of the check valve was not expected to alter the face-to-face flange dimensions at the expansion joint (SSW04). Therefore, the planning package for the modification did not consider the need to specify quantitative or qualitative acceptance criteria for the expansion joint.

During earlier activities related to replacement of the expansion joints for the "A" and "B" Service Water pumps during the 1994 outage, nonconforming conditions were identified, and documented on a Nonconformance Report (NCR). However, the corrective action rework resulting from this earlier NCR were not recognized as applicable to future work. This was a missed opportunity to convert the lessons learned from the "A" and "B" expansion joint conditions into upgraded technical process controls for the "C" Service Water expansion joint work. It is noteworthy to mention that the design allowable elongation of this expansion joint is 3/8 inch, a small fraction of the overall length of the expansion joint, which is between approximately ten inches.

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

Upon discovery of this condition, the manufacturer was consulted. Based on evaluations and subsequent field inspection by the manufacturer, it was concluded that degradation that occurred did not affect system operability. However, the design maximum pressure-retaining capability had been compromised, though the joints were still able to meet the service requirements of the Service Water system. This condition was then documented as a nonconforming condition on NCR 94-128, and was justified for interim use, based on the manufacturer's assessment.

A replacement expansion joint, designed to the specific flange-to-flange dimensions, was procured. RG&E elected to replace the joint upon receipt of the newly procured expansion joint. After replacement on December 28, 1994, the expansion joint was within the manufacturer's installation criteria, including full elongation capability.



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

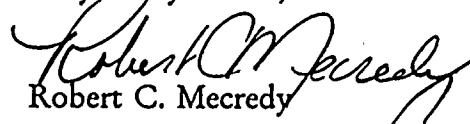
- A new maintenance procedure (GMP-11-14-01) is being developed. GMP-11-14-01 will provide instructions for installation of the Service Water pump discharge expansion joints, including quantitative or qualitative acceptance criteria.
- The controls for installation of the new check valve for the "D" Service Water pump discharge (the remaining unmodified pump discharge check valve) will include engineering controls for the installation of the expansion joint, as an integral part of the modification. The modification procedure will contain appropriate acceptance criteria for the expansion joint.
- An investigation will be performed to assess similar applications of expansion joints in the plant, and will include an evaluation of engineering, procurement, vendor issues, work package preparation, alignment of management expectations with predetermined acceptance criteria, and administrative controls. The objective of this investigation is to identify the need for quantitative or qualitative acceptance criteria for other applications.
- Mechanical maintenance personnel will be trained on new procedure GMP-11-14-01, prior to use.

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

Full compliance with the configuration of the "C" SW pump expansion joint was achieved on December 28, 1994, when the replacement joint was installed.

Full compliance with quantitative or qualitative acceptance criteria for Service Water system expansion joints will be achieved with the approval of procedure GMP-11-14-01. This procedure will be approved prior to completion of the 1995 outage.

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

