

# CATEGORY 1

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 FACIL: 50-244 Robert Emmet Ginna Nuclear Plant, Unit 1, Rochester G      05000244  
 AUTH. NAME      AUTHOR AFFILIATION  
 MECREDDY, R.C.      Rochester Gas & Electric Corp.  
 RECIP. NAME      RECIPIENT AFFILIATION  
 VISSING, G.S.

SUBJECT: Responds to NRC ltr re violation noted in insp rept  
 50-244/96-05.C/A: Full compliance was achieved on 960521,  
 when personnel suspended all core alterations & movement of  
 irradiated fuel assemblies within containment.

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ROBERT C. MECREDY  
Vice President  
Nuclear Operations

September 4, 1996

U.S. Nuclear Regulatory Commission  
Document Control Desk  
Attn: Guy S. Vissing  
Project Directorate I-1  
Washington, D.C. 20555

Subject: Reply to a Notice of Violation  
NRC Integrated Inspection Report 50-244/96-05 and Notice of Violation, dated  
July 26, 1996  
R.E. Ginna Nuclear Power Plant  
Docket No. 50-244

Reference: (a) Letter from R. C. Mecredy to NRC,  
Subject: Licensee Event Report 96-006,  
Containment Penetration Not in Required Status,  
dated June 20, 1996

Dear Mr. Vissing:

As a result of an inspection conducted on May 5 - June 15, 1996, the following violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violation is listed below:

10 CFR 50, Appendix B, Criterion V requires that activities affecting quality be prescribed and accomplished in accordance with documented procedures, and that these procedures include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.

Operations procedure O-15.2, "Valve Alignment for Reactor Head Lift, Core Component Movement, and Periodic Status Checks," required that containment penetration P-2 be "adequately sealed" prior to refueling, and be independently verified by two operating personnel. Station Modification procedure SM-10034-10.01, "Temporary Service Air System for SGRP," contained a requirement to maintain the temporary service air line (in penetration P-2) pressurized or its isolation valves closed during fuel movement in containment.

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Contrary to the above, on May 21, 1996, Procedures O-15.2 and SM-10034-10.01 were not adequately accomplished, and did not contain appropriate acceptance criteria, in that containment penetration P-2 was not adequately sealed during the movement of irradiated fuel inside containment. The temporary service air line was removed such that penetration P-2 contained one approximate 3 inch diameter hole and one approximate 1-1/2 inch diameter hole passing through its entire length from the inside to the outside of containment. This condition persisted for approximately 3 and 1/2 hours during movement of irradiated fuel inside containment.

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

Rochester Gas & Electric Corporation (RG&E) accepts the violation that P-2 was not in the required status of being adequately sealed during movement of irradiated fuel assemblies inside containment for a period of less than one hour. A Human Performance Enhancement System (HPES) investigation was performed in May 1996. The results of the HPES investigation were reported to management. The HPES report concluded that the temporary lines were removed from P-2 prior to the start of movement of irradiated fuel inside containment. As such, it was also concluded that Procedure O-15.2 was not adequately accomplished the night before. Management initially accepted the conclusions stated in the HPES report.

Further management review of this event has now reached a different and more plausible conclusion. It is now believed that P-2 was, in fact, adequately sealed until sometime after 0800 EDST on the morning of May 21, 1996. Thus, all preparations for the start of refueling activities were satisfactorily accomplished, including Operations verification that P-2 was adequately sealed. This updated conclusion is supported by the recollections of RG&E Steam Generator Replacement Project (SGRP) personnel, which is consistent with the recollections of RG&E Operations personnel.

This change in position is due to the fact that the HPES investigator gave too much credence to the recollections of SGRP contractor maintenance personnel. Upon further management review, these recollections were contrary to all other information and were apparently in error. Refueling operations were initiated at 0537 EDST on May 21, 1996, and RG&E now believes that P-2 was adequately sealed at that time. Sometime during the SGRP contractor dayshift (after 0800 EDST on May 21, 1996), contractor maintenance personnel removed the piping from P-2. P-2 was not adequately sealed from sometime after 0800 EDST until the movement of fuel was stopped at 0900 EDST on May 21.

Thus, RG&E maintains that Procedure O-15.2 was adequately accomplished and that it contained appropriate acceptance criteria. RG&E accepts that Procedure SM-10034-10.01 was not adequately accomplished. The reason for the violation was a personnel error, as stated in Section III. C. of Reference (a) (LER 96-006). However, the personnel error was only on the part of contractor maintenance personnel, who did not recognize the impact on refueling operations of removing the pipe spoolpieces from P-2. (The LER, which was based on the HPES report, incorrectly stated that Operations personnel made cognitive errors.) There was a breakdown in work controls, in that the contractor maintenance personnel removed the lines from P-2 contrary to the guidance of SM-10034-10.01.



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

As stated in Reference (a), refueling operations were immediately suspended upon discovery of this condition. A flange was installed on P-2, restoring P-2 to compliance with Ginna Station Improved Technical Specifications (ITS) Limiting Condition for Operation (LCO) 3.9.3.c. Refueling operations were then permitted to resume.

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

While performance of Procedure O-15.2 had no impact on this event, there are enhancements that can be made to this procedure. Procedure O-15.2 will be revised prior to the next scheduled refueling outage to require additional controls at P-2 to prevent the configuration of P-2 from being changed during refueling operations.

Procedure SM-10034-10.01 was used only during the SGRP during the 1996 outage. The personnel who accomplished these activities are no longer contractors at Ginna Station. Nevertheless, there are lessons that have been learned from this event, and a Nuclear Training Work Request has been initiated to train on these lessons learned.

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

Full compliance was achieved at 0900 EDST on May 21, 1996, when RG&E personnel suspended all core alterations and movement of irradiated fuel assemblies within containment. P-2 was restored to operable status at 0937 EDST on May 21, 1996.

Very truly yours,

Robert C. Mecredy

xc: Mr. Guy S. Vissing (Mail Stop 14C7)  
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