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 Project Directorate I-1 (PD1-1) (Post 941001)

SUBJECT: Responds to NRC 960924 ltr re violations noted in insp rept
 50-244/96-06 on 960616-0720. Corrective actions: immediately
 installed locks on 8 manual SW loop header cross tie valves
 & to perform surveillance.

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ROBERT C. MECREDY
Vice President
Nuclear Operations

October 30, 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 50-244/96-06 and Notice of Violation, dated
September 24, 1996
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Vissing:

During an NRC Inspection conducted between June 16 and July 20, 1996, two violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

- A. Technical Specifications Surveillance Requirement 3.7.8.3 requires that all service water loop header cross tie valves be locked in position and verified locked every 31 days. Valves V-4610, V-4611, V-4612, and V-4779 are required to be locked closed, and valves V-4623, V-4639, V-4640, and V-4756 are required to be locked open when the plant is operating in Modes 1, 2, 3, and 4.

Contrary to the above, from February 24, 1996 to June 17, 1996, valves V-4610, V-4611, V-4612, V-4779, V-4623, V-4639, V-4640, and V-4756 were not locked. The plant was in Modes 1, 2, 3, or 4 from February 24 - April 2, and from June 3 - June 17, 1996. The plant was below Mode 4 during a refueling outage between April 2 and June 3, 1996. Surveillance procedure S-30.8 required a monthly verification that these valves were in their correct positions, but it did not require a verification that the valves were also locked.

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

Rochester Gas & Electric Corporation (RG&E) agrees that these eight (8) valves were required to be locked and were not locked. Note that these valves were in the correct position and were periodically verified in that position. Since the valves were not locked, we also agree that they could not be verified as locked.

The original submittal of the Ginna Station Improved Technical Specifications (ITS) was on May 26, 1995, with the proposed technical specifications referred to as "Draft A". This draft submittal required verification every 31 days that "each SW manual, power operated, and automatic valve in the SW train flow path and loop header servicing post-accident related equipment, that is not locked, sealed, or otherwise secured in position, is in the correct position" (SR 3.7.8.1). The bases provided additional clarification by stating that this surveillance requirement (SR) also included "verification of the SW cross-connect valves". In accordance with Ginna Station Administrative Procedure A-601.7, "Preparation, Approval and Implementation of Amendments to Technical Specifications", an assigned representative of the Operations Group identified procedures to perform required surveillances. With respect to proposed SR 3.7.8.1 in Draft A, the representative determined that no changes to existing station procedures were necessary, since procedure S-30.8, "Service Water System Valve Position Verification" verified all major SW system valve positions (including locked valves).

During the week of October 9-13, 1995, RG&E and the NRC met to discuss proposed Draft A with respect to Chapter 3.7. At that time, it was noted that several of the SW cross-tie valves were locked in position. As such, given the wording of proposed SR 3.7.8.1, these cross-tie valves would not be required to be verified. Passive failures of these manual valves (including mispositioning) is not within the design and licensing basis of Ginna Station. However, RG&E agreed that it was prudent to include some verification requirement for these manual valves due to their importance with respect to balancing SW flow, even though no similar SR existed in standard technical specifications. Therefore, RG&E agreed to remove the SW cross-tie valves from SR 3.7.8.1 and add a new surveillance to verify that these locked valves were in the correct position every 31 days. Since the Nuclear Engineering Services (NES) representative preparing the ITS mistakenly believed that these valves were all locked in position (versus only 4 valves), the new SR was also worded to require that the cross-tie valves be locked even though this was not required per the SW system design and licensing basis.

The new SR was added in Draft B of the ITS, dated December 28, 1995 (see SR 3.7.8.3). During review of Draft B, the Operations Group representative noted that there was a new SR 3.7.8.3 with respect to the SW cross-tie valves, but did not recognize that the new SR also required all of the valves to be locked in position. Consequently, no changes to station procedures were considered necessary since procedure S-30.8 already verified the position of these SW cross-tie valves, whether locked or not.

The cited violation does not reflect a general lack of knowledge by the plant staff with respect to the new requirements in the ITS. Rather, it was due to unknowingly adding a new requirement to lock these valves and the failure to identify this change and reflect it in the necessary procedures. This was an isolated incident induced by the large number of changes between Draft A and Draft B of the ITS submittals. It is noted that RG&E spent 8,800 man-hours implementing the ITS at Ginna Station over an 8 month period, which included training and necessary procedure changes. This implementation period and the subsequent use of the ITS have resulted in sound knowledge of the ITS by plant personnel.

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

The corrective action was to immediately install locks on the 8 manual SW loop header cross tie valves (by 8AM on June 18) and to perform the required surveillance. Appropriate guidance was added to procedure S-30.8, "Service Water System Valve Position Verification", to lock and verify that these 8 valves are locked and in the correct position. Procedures A-52.2, "Control of Locked Valve and Breaker Operation", and T-36.1, "Station Service Water Header Valve Alignment for Two Loop Operation", were also revised to include the locked status of these 8 valves.

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

- a. All significant changes to the original ITS submittal were reviewed to ensure there is adequate procedural guidance.
- b. The system drawing for SW was revised to include the locked status of these valves.
- c. The procedural guidance for implementing Technical Specification amendments will be evaluated for improvements.

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

Full compliance was achieved on June 18, 1996, when these 8 valves were verified to be locked in their correct positions.

- B. 10 CFR 50.59(b)(1) requires, in part, that the licensee maintain records of changes in the facility and of changes in procedures made pursuant to this section, to the extent that these changes constitute changes in the facility as described in the safety analysis report. These records must include a written determination that the change, test, or experiment does not involve an unreviewed safety question.

Contrary to the above, in May 1994 the licensee modified service water valve MOV-4616 by making a significant change to its closing time without performing a safety evaluation. This change created the potential for not meeting the assumed or design service water flows listed in the Updated Final Safety Analysis Report (UFSAR) for the diesel generator and containment recirculation fan coolers to perform their safety function and thereby operating the plant different from that described in the UFSAR. Specifically, in May 1994 the licensee changed the closing time of valve MOV-4616 from approximately 30 to approximately 120 seconds and operated the plant in this configuration until May 1996 when the closing time was changed to approximately 60 seconds, for which the licensee performed a safety evaluation.

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

RG&E accepts the violation, with the clarification that the review of the change against the requirements of the UFSAR was performed. This review determined that valve timing for the subject valve MOV-4616 was not described in the safety analysis report and therefore the change did not require a safety evaluation per 10CFR50.59. This conclusion was documented in the change package that was prepared at the time.

However, RG&E has concluded that this review was inadequate in that, even though a specific UFSAR statement did not exist with respect to the valve stroke time, the effects of this change should have been evaluated against the ESF functions discussed in other sections of the UFSAR. We acknowledge that the controls and program requirements in place at the time were inadequate, and that the review was too narrow and did not adequately address the potential for safety impact.

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

As part of the ongoing efforts with the Service Water System Reliability and Optimization Program (SWSROP), in early 1995, a design analysis was performed to review the effects of the changed stroke time of MOV-4616. The design analysis demonstrated that the SW supply requirements for the ESF functions were still met with the 120 second stroke time of MOV-4616. However, it was noted that SW system fouling could increase over time, potentially degrading SW flow rates. The design analysis concluded that the stroke time should be restored to its original 30 second stroke time during the 1996 refueling outage.

Due to parts supply problems, it was not possible to make the necessary mechanical changes to restore the original stroke time. Another design analysis was performed and recommended that the valve be positioned to achieve a stroke time of 60 seconds. The analysis and subsequent safety evaluations determined that this action was acceptable for the current fuel cycle.

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

- a. RG&E has performed extensive Safety Review/Safety Evaluation procedure training (this was noted in NRC Inspection Report 96-07), which provides more direction and increased controls to ensure an increased scope of evaluation.
- b. RG&E has devised and implemented a more inclusive corrective action process which has provided for increased scrutiny in the observation of potentially non-conforming conditions.
- c. As an interim measure, all Nuclear Operations Group (NOG) personnel will be notified by November 6, 1996, that changes which involve the performance of a safety related system and which may be beyond the level of detail of the UFSAR must also have a Safety Review performed. This example will be added to the Safety Review/Safety Evaluation procedures.
- d. In the longer term, RG&E is initiating an effort to explicitly document all variables (stroke time, flow rate, etc.) that are assumed in the Accident Analysis chapter of the UFSAR. These variables will be listed in a controlled document that will be available to appropriate NOG personnel.
- e. Actions have been initiated to restore the valve stroke time to 30 seconds during the 1997 refueling outage.

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

Full compliance was achieved on April 19, 1995, when the design analysis was completed that confirmed that the stroke time changes did not result in a change as described in the UFSAR as originally determined.

Very truly yours,


Robert C. Mecredy

c: Mr. Guy S. Vissing (Mail Stop 14C7)
Project Directorate I-1
Washington, D.C. 20555

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Ginna Senior Resident Inspector