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SUBJECT: Forwards SALP Rept 50-244/86-99 for June 1986 - Nov 1987.

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April 21, 1988

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U.S. Nuclear Regulatory Commission
Attn: Mr. William T. Russell
Regional Administrator
Region I
475 Allendale Road
King of Prussia, PA 19406

Dear Mr. Russell:

The enclosure to this letter provides comments on the NRC Systematic Assessment of Licensee Performance (SALP) report for Ginna Station. Although specific comments are offered on this report, the report is a good and fair assessment of our nuclear operations. RG&E accepts the recommendations made by the SALP Board concerning engineering resources, the interface between the Operations and Engineering Divisions and the use of Quality Assurance and Quality Control as a management tool, and will evaluate means to implement the recommendations.

Thank you for the effort put forth to provide RG&E with your assessment of our corporate performance and especially for the opportunity to discuss this report with NRC personnel on March 23.

Very truly yours,

Bruce A. Snow
Superintendent
Nuclear Production

Enclosure

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Ginna Resident Inspector

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ENCLOSURE 1

COMMENTS ON

SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE

INSPECTION REPORT 50-244/86-99

R.E. Ginna Nuclear Power Plant
Rochester Gas and Electric Corporation

Assessment Period June 1, 1986 - November 30, 1987

Introduction

The reliable and safe operating record of the R.E. Ginna Nuclear Power Plant is a result of the performance of the working level staff at the plant and within the Engineering Division. The successful operation of the plant in meeting the high standards of performance demanded at nuclear power plants is a source of pride for the members of the organization. RG&E also recognizes that there are areas where improvements can be made and accepts the recommendations of the SALP Board concerning Engineering resources, the interface between the Operations and Engineering Divisions as it affects timely resolution of matters requiring Engineering support, and the use of Quality Assurance and Quality Control as a management tool and as a means to identify, track and resolve quality concerns. The Board's recommendations will be evaluated and appropriately implemented within the Company.

Specific comments related to the SALP report are given in the following paragraphs. The intent of the comments is to clarify statements made within the report and to provide additional information to improve the understanding of the RG&E organization and activities.

Plant Operations

A major program has been established to review and evaluate human performance errors. We anticipate that this INPO-developed Human Performance Evaluation System (HPES) in conjunction with improvements being implemented in many of the station procedures will help reduce personnel errors.

Improvements have been implemented in the temporary modification program to provide better review of, and control over, activities affecting plant configuration. This, in conjunction with resolution of pre-controlled temporary modifications and implementation of periodic internal audits, should lead to continuing improvements.

Subsequent inspection reports have acknowledged housekeeping improvements in portions of the plant. This is part of a systematic housekeeping effort throughout the entire plant to improve housekeeping and material conditions.

As noted in the SALP report, LER reports are written by the responsible department at the station. As discussed during the March 23 meeting, this practice will continue as will our efforts to continue to improve the quality of the reports.

Radiological Controls

Significant efforts have gone into our ALARA program as evidenced by low annual exposures in spite of significant activities such as split pin replacements and steam generator maintenance. We believe that use of a full-scale steam generator mockup and our extensive steam generator training program have contributed greatly to reduced exposures. Examples of poor ALARA implementation cited in the report is rather an example of good ALARA analysis. Tritium exposure occurred to refueling workers (<40 MPC-hours) because of a modification performed on the purge supply and exhaust valves to meet an NRC commitment. If the modification and refueling work had not been performed concurrently, the outage length would have been extended and the total exposure would have been expected to increase because of increased duration of exposure to support crews. The decision not to use an air mover on the steam generator logistics tent (not a decontamination facility) was made because masks were required even if an air mover was in use, and the air movers could be used more effectively to reduce doses in other areas. Since that time we have also purchased more air movers but we will continue to evaluate the most effective use of equipment at any time. The use of mockups and the examples cited above are demonstrations of appropriate decision making in our effort to maintain radiation doses as low as reasonably achievable.

Clarifications are provided here for several examples cited in the report.

- o A controlled area incident log is now in effect although it was not at the time of the report.
- o An ALARA procedure and checklist for engineering modifications was issued for use in September 1987, before the end of the reporting period.
- o A routine air sampling procedure and a procedure for operating the SRM-100 were in place prior to the end of the reporting period.
- o A method to highlight procedure changes has been in effect for several years although it has apparently not been reviewed by the NRC.

Maintenance

Improvements have been made in the conduct of our maintenance program which address the control of activities and the incidents relating to emergency diesel generator operation and valve maintenance. As noted in the report, a Senior Reactor Operator (SRO) has been assigned to review all maintenance requests. This will improve our capability to

properly classify and control maintenance work and to identify the significance of maintenance work. The outage planning team has also been enhanced with additional people with operator training. This enhancement will assure that overall plant safety is appropriately considered when scheduling activities.

Other initiatives have also been undertaken in the maintenance area. We have performed a systematic self assessment of maintenance practices including resources, procedures, organizational structure and policies. This, in conjunction with implementation of a maintenance procedure upgrade program, initiation of a Reliability Centered Maintenance Program with EPRI, and the addition of a technical assessment/analysis group in the maintenance organization will provide continued strength in the maintenance area.

Surveillance

RG&E Management is pleased with surveillance activities and will work to improve the minor weaknesses identified in the report.

Emergency Preparedness

RG&E Management has been pleased with the demonstrated capability to respond to emergency conditions. Initiatives to further enhance our capabilities are being investigated. They include use of the simulator during exercises to relieve congestion in the control room and to avoid distraction of the operators while the emergency response team is simulating conditions in the control room different from the true operating conditions. The use of journalism classes is being considered to return challenge to the Joint Emergency News Center by supplementing the news media who now consider exercises routine.

Security and Safeguards

RG&E Management is committed to maintaining an effective security program. RG&E personnel participate with a Regional group of security specialists in an effort to maintain a strong program consistent with industry practices and regulatory requirements. RG&E has sought out and seeks to maintain high level personnel with a broad background in security affairs.

Licensing Activities

RG&E will continue to provide strong support for current licensing issues and for efforts to reduce the backlog of currently open issues. Recent stability in the NRC organization, our commitment to address concerns and issues of the NRC, and more frequent communication by RG&E management with the NRC team will prevent recurrence of the minor weaknesses noted in the report.

Engineering and Technical Support

We acknowledge and agree that lack of technical resources has affected the ability of the Engineering staff to address the backlog of routine engineering work and to be proactive. We appreciate the recognition that our current staff is highly talented, innovative and experienced and is performing high quality engineering. Since the end of the SALP period a modest increase in Engineering staff has been approved and an overall assessment of the Engineering resources needed to support Ginna Station in a more proactive mode is being performed. As staffing increases are identified, we will carefully pursue the pace of these additions such that we maintain close control over the quality of the engineering.

Engineering is pursuing an improvement in the interface with Ginna Station. It should be noted that examples of highly successful interfacing are present elsewhere in the SALP report. The Inservice Inspection Program and the pipe wall thinning investigations noted in the Surveillance section were activities coordinated and carried out by Engineering Division personnel.

The control room design review was an Engineering-managed project and enhancements to the control room such as lighting and paint-tape-label enhancements of the main control board (see SALP report page 10) were Engineering-managed modifications requiring close coordination with control room operators and activities. The first-of-a-kind installation of the micro-processor based rod position indication system and the boric acid piping replacement (SALP page 17) were also Engineering-managed projects. Successful response to the drain line elbow failure (SALP page 19) involved extensive technical support of Engineering design personnel.

We are actively pursuing continued improvement in the engineering interface with Ginna. The Milestone Scheduling System implemented in April 1987 has already resulted in improved communications and interface and we expect further improvements. A capital priority and ranking system has been in place since October 1986 to develop mutual Operations and Engineering Division agreement on work scope and priority.

Detailed post-outage reviews of key plant modifications are being performed with the objective of improving both the quality of modifications and the interface. More regular Engineering attendance at MOPAR meetings has been initiated. Further initiatives will be sought to improve the interface.

Additional clarifications on specific statements made in the report are given below:

- o Detailed engineering training has been conducted in the environmental qualification area and the NRC inspection report reflected no violations or concerns in this area. Use of consultants in establishing our program and in responding to the inspection was due to RG&E resource availability, not due to lack of knowledge and training on the part of responsible Engineering personnel.
- o Regarding the IEB 79-02 requirements, RG&E has incorporated the requirements of this Bulletin into our Seismic Upgrade Program, a proactive program initiated in 1979 to upgrade safety related piping to current criteria. Anchor bolt factors of safety were calculated for all piping systems in a timely manner except for the Standby Auxiliary Feedwater System and a small portion of the Service Water System. We acknowledge the omission of these systems. The load change characteristics noted in the inspection report involved only four pipe supports out of more than 1700. We have revised our design process to preclude recurrence. Finally, we are not aware of requests to RG&E to resolve these issues other than the mid 1987 inspection addressed in the SALP report.
- o The oversight regarding the station batteries during the EDG modification was corrected during the modification installation, prior to turnover for use of the modification.

Training and Qualification Effectiveness

The Company has devoted significant resources to our INPO accreditation program with positive results. We agree that use of the plant specific simulator has produced direct benefits to the operator training program. We anticipate that the simulator will be used even more in coming years to assess operational transients and to practice for startups and heatups and cooldowns of the plant. In this way we expect to provide additional support to our already highly qualified operating staff.

As noted in the Operations section, implementation of the HPES is also expected to improve human performance in all areas by evaluating human performance problems to improve our training, procedures and methods.

A systematic approach utilizing the INPO accreditation methodology is being used to develop a comprehensive training program for QC inspectors.

Assurance of Quality

The SALP report recommended two actions to be taken by RG&E:

- o Assess the plant Operations and corporate Engineering interface and make the necessary changes to ensure timely resolution of those matters requiring Engineering support.
- o Improve the use of QA and QC as a management tool and broaden the scope of the formal identification, tracking and resolution of quality concerns and problems.

Several aspects of the Operations and Engineering interface have been addressed in the Engineering and Technical Support section including Engineering contributions to significant capital improvements, inspection programs, response to NRC and generic concerns, detailed post-outage reviews of plant modifications and Engineering participation at MOPAR meetings. A capital priority ranking system that provides assessment of matters requiring Engineering support with input from plant Operations and Engineering has been in use for more than two years. The Milestone scheduling system has improved communications and the interface between divisions. Improvements will continue to be sought although timely resolution of matters may be more a matter of corporate resources than a weakness in the interface between the plant and Engineering. We expect that additional resources will be made available in a controlled manner to address technical issues, improve the timeliness of response and assure the quality of engineering is maintained. Assessments of the interface and timeliness of resolution of issues will be made.

Regarding the use of QA and QC as a management tool, several actions are being taken. Responsibility to process CARs, and to perform followup so as to focus on reported quality deficiencies, has been reassigned to the Superintendent. The augmented maintenance organization with a dedicated corrective action coordinator has already reduced the backlog of open items. Monitoring by the QA/QC subcommittee is helping to maintain attention to problems where solutions have stagnated.

Quality Control staffing is being augmented, training is in progress and surveillance guidelines are being established which will permit more effective surveillance of ongoing operator and maintenance activities. A monthly QC surveillance summary report to management is being developed as a mechanism for providing timely focus on quality deficiencies, concerns and related trends.

With consultant assistance, Quality Assurance has recently begun to augment their audit guidelines and training regarding performance based assessments. Special audits are also being utilized more frequently to provide department management with an assessment of the status and effectiveness of special projects. Technical expertise is being utilized more extensively on specialty audits such as radiological controls, emergency preparedness, engineering design, environmental qualification and the D.C. fuse upgrade program.

Adjustments were made early in 1987 to direct QC reports of surveillance efforts to the first line supervision as well as their management. More timely attention to rectify identified deficiencies has been apparent.

Post outage reviews of Non Conformance Reports (NCRs) are expected to identify actions that will reduce repeat problems. This review will also identify those NCRs which reported concerns more appropriately handled by a different method.

Methods to optimize the processing of CARs are being evaluated by the Ginna staff to ensure actions are appropriately assigned and assignments routinely monitored.

Other recently-implemented initiatives of the QA/QC organizations to improve the effectiveness as a management tool include:

- a. QC is involved in maintenance planning through their review of maintenance work orders.
- b. Representatives of both groups conduct a two day training session on Quality Assurance principles and policies as part of the Technical Staff training program.
- c. QA/QC supervision initiated quarterly reviews of various corrective action trends to identify underlying deficiencies and problems. This effort provides suggestions and recommendations to cognizant supervision.
- d. QC is working on a pilot training effort for the Ginna maintenance groups. QC is extracting "need to know" material from the implementing quality procedures which will result in a tailored training syllabus for each maintenance group. When implemented, this will improve the quality program at the worker level.

