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 MARTIN,T.T. Region 1 (Post 820201)

SUBJECT: Responds to NRC 900717 ltr re violations noted in Insp Rept
 " 50-244/90-80.Corrective actions:NCR issued.

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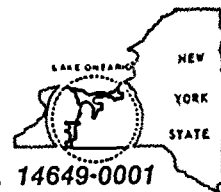
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ROBERT C. MECREDY
Vice President
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TELEPHONE
AREA CODE 716 546-2700

August 16, 1990

Mr. Thomas T. Martin
Regional Administrator
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Subject: Response to Notice of Violation Inspection Report
50-244/90-80
R.E. Ginna Nuclear Power Plant
Docket Number 50-244

Dear Mr. Martin:

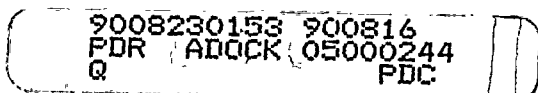
Your letter dated July 17, 1990, from Mr. Robert M. Gallo, Chief Operations Branch Division of Reactor Safety Transmitting, Enclosure 1, Appendix A, Notice of Violation, identified two (2) violations, one with two examples.

The following provides a reply to those violations pursuant to 10 CFR 2.201:

Restatement of Violation (in part)

1. Technical Specifications Section 6.10.2 requires that records and drawing changes be retained for the duration of the Facility Operating License. Station Procedure A-603 states: 1) All as-built drawings listed in Table 1 shall be received by the Central Records Specialist for distribution; and 2) As a minimum, one copy of each document shall be retained by the Central Records Specialist in accordance with the requirements of Reference 2.1. (Reference 2.1 is Procedure A-1701, Ginna Records).

Contrary to the above, no copy of Westinghouse drawing E-2508, for the N-31 Source and Intermediate detector before and after the recent modification that added a drainage hole to detector housing WL-23785, was being retained by the Central Records Specialist during the April 1990 team inspection.



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2. 10CFR50.59(a)(2) specifies, in part, that a proposed change shall be deemed to involve an unreviewed safety question if a possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report may be created.

10CFR50.59(b)(1) specifies, in part, that the licensee shall 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 safety evaluation which provides the basis for the determination that the change, test, or experiment does not involve an unresolved safety question.

Station Procedure 301.1, Station Modification classification and Review, Steps 3.2.2 and 3.2.3 describe modifications as: 1) a change which involves a component change (vendor product improvement or user initiated) and 2) changes to... structures ... which affect performance requirements...

- A. Contrary to the above, the use of a building identified in the Updated Final Safety Analysis Report, Figure 1.2-1, Ginna Station Plot Plan, as a storage building, was changed to include long term storage of radioactively contaminated equipment without completing a written safety evaluation which provided the bases for the determination that the use of this building for contaminated storage does not involve an unresolved safety question. Contaminated equipment had been stored in this building from at least 1983 until April, 1990.
- B. Contrary to the above, As of April 20, 1990, Work Order 90-21224 replaced the original N-31 Source Range Detector, without drain holes, with a new housing, with drain holes, without completing a written safety evaluation which provided the basis for the determination that the modification does not involve an unreviewed safety question. The nuclear instrument system source range is described in the Updated Final Safety Analysis Report, Section 7.7.3.2.1.

Reason for Violation 1

Rochester Gas and Electric acknowledges that Westinghouse drawing E-2508 for the N-31 source and N-35 intermediate detector including before and after modification revisions were not being retained by the Central Records Specialist. However, Procedure A-603, "Control of As-Built Drawings and Design Documents", Table 1 listed only Controlled Configuration Drawings (CCD) and did not include Westinghouse drawings such as E-2508. Procedural direction for processing vendor drawings received by Ginna Station as a result of Station originated procurement did not exist, whereas drawings received as a result of Engineering originated procurement are controlled by QE-606, "Receipt, Control and Distribution of Drawings and Aperture Cards".

Corrective Steps Which Have Been Taken and Results Achieved

Westinghouse drawing E-2508 referenced in WO number 90-21224 has been reviewed by Nuclear Engineering Services. Drawing E-2508, Revision 0, applies to the excore neutron detector housing assembly now installed in the N-32/N-36 well. The drawing has been approved and has been issued to Central Records.

A revised Westinghouse drawing E-2508, Revision 3, has not yet been received by RG&E. Westinghouse (reference letter RG&E-90-562, May 8, 1990) has advised that "Revision 3 is being generated to reflect the design changes incorporated with drilling a hole in the bottom of the assembly...and will be transmitted once it has been updated by the manufacturer and review/approved by Westinghouse." Westinghouse has informed RG&E that a revision to drawing E-2508 will be transmitted in the near future.

Once received, this drawing will be reviewed for approval and distributed per QE-606.

The Corrective Steps Which Will Be Taken To Avoid Further Violations

A Nuclear Engineering/Records Management Ad Hoc Group has been formed to analyze various document control issues. An analysis of the vendor drawing review and approval process, as well as the document control management of vendor drawings, is underway. Changes to plant and engineering have been drafted and are under committee review.

Additionally, a preliminary assessment of past work related to vendor drawings has begun. This assessment will be continued within the Ad Hoc Group charter responsibilities.

The Date When Full Compliance Will Be Achieved

Revisions of A-606, "Drawing Change Request" and QE-606, "Receipt Control and Distribution of Drawings and Aperture Cards" to provide specific direction for processing vendor supplied drawings will be completed by December 20, 1990.

Reason for Violation 2 - Example A

RG&E agrees with the violation as stated above, in that no documented safety evaluation existed for the use of a storage building for storage of contaminated equipment. In the mid 1970's, a pole barn was constructed on the southwest corner of the site for concrete mixing and storage. During the 1980-1981 time frame, a concrete floor with an installed drain was constructed, in preparation for storage of equipment. In September of 1982, the building was used for the storage of packaged contaminated equipment. A historic search through past PORC meeting minutes indicates no documented safety analysis exists for the conversion of this pole barn structure into a contaminated storage building.

Corrective Steps Which Have Been Taken

Immediately upon the detection of moisture inside the Radioactive Material Storage Area (RMSA), actions were taken to eliminate the possibility of rainwater induction. The overhead roof vents were bolted closed, and the drain was covered to prohibit potential releases. RG&E has performed a 10CFR50.59 safety evaluation for the storage of contaminated equipment inside the RMSA. This PORC approved safety evaluation determined that no unreviewed safety question exists from the storage of contaminated material inside this building.

Corrective Steps Taken To Avoid Further Violations

RG&E believes that the lack of a 10CFR50.59 safety evaluation documentation for the conversion of the RMSA to a radioactive contaminated storage building is an isolated event. Current work process control A-1603 series procedures and modification process control A-300 series procedures provide administrative controls



to ensure a 10CFR50.59 evaluation be performed for any changes to the facility which are not a direct one-for-one replacement. These guidelines would prohibit the installation or conversion of a building addressed in the UFSAR without a documented, approved 10CFR50.59 safety evaluation.

Date When Full Compliance Will Be Achieved

RG&E is currently in full compliance of 10CFR50.59(a)(2) and 10CFR50.59(b)(1) since a documented safety evaluation for the use of the RMSA as a storage building for contaminated storage has been performed and approved by PORC.

Reason for Violation 2- Example B

RG&E agrees with the Violation 2B as stated above, in that a modified Source/Intermediate Range (S/IR) detector housing assembly was procured and installed without evidence of the proper reviews being completed and documented by RG&E Engineering. In-depth investigation indicates that the root cause of this incident was inadequate and ineffective notification of modifications to the licensee by the supplier Westinghouse NSID.

Corrective Steps Which Have Been Taken and Results Achieved

Immediate corrective actions taken to address the non-documented modification included:

1. Initiation of Nonconformance Report (NCR) 90-140.
2. Evaluation of the nonconformance (modification) by RG&E Engineering. The modification was determined to be a conservative enhancement to the S/IR assembly. Therefore, the NCR disposition was "use-as-is".
3. 10CFR Part 21 reporting was evaluated and determined not applicable due to the "use-as-is" disposition of NCR 90-140.
4. Completion of a 10CFR50.59 evaluation in conjunction with disposition of the referenced NCR.

5. Initiation of RG&E correspondence (Podlena to Hofscher) dated April 23, 1990, requesting the safety evaluation, reason for exclusion from the bulletin and other information relating to the S/IR assembly. The response to the RG&E correspondence was generated and forwarded to RG&E May 8, 1990.

Corrective Steps Which Will Be Taken to Avoid Further Violations

Virtually all of the corrective actions to prevent recurrence of situations similar to this had been implemented, as enhancements to the procurement process, prior to performance of Inspection 90-80. The enhancements included:

1. Formation of a Procurement Engineering Group which is responsible for technical review of items prior to procurement.
2. Revision of Ginna Station Administrative Procedure A-301, "Preparation and Disposition of Technical Staff Requests".
3. Implementation of Ginna Station Administrative Procedure A-305, "Technical Staff Engineering Evaluations".
4. Revised/clarified vendor procurement requirements.

The Procurement Engineering Group was established to evaluate all spare/replacement parts procured by Ginna Station prior to procurement. This review is performed to assure:

1. Proper nuclear safety classification of the item.
2. Correct quality and technical requirements are delineated on the purchase requisition.
3. Any changes from the original design specification are formally evaluated and documented.

The revision of A-301 provided the methods for Procurement Engineering to identify vendor initiated design changes to Technical Engineering for classification. Additionally, this revision established the Technical Staff Engineering Evaluation (TSEE) as a method to disposition a Technical Staff Request (TSR) which is classified as an equivalency evaluation.

The implementation of A-305 provided Procurement Engineering with the procedural guidance to perform Technical Staff Engineering

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Evaluations for TSR's classified as "equivalency evaluations" by Technical Engineering. These changes provided concise methods to assure that vendor initiated changes are identified, evaluated and documented prior to item procurement.

As previously mentioned, the vendor procurement requirements were clarified/revised prior to the performance of Inspection 90-80. Clarification of the impact this has on procured items follows:

Many of the procurement requirements imposed on vendors are identical. Therefore, it is useful to code as many of the standard requirements as possible and reference them to specific items in the computer used to generate the purchase requisition. This was a standard practice long before the formation of the Procurement Engineering Group. However, many of the coded requirements were unclear or lacked sufficient instruction. All the standard procurement requirements were revised and brought under strict control of Procurement Engineering in mid 1989. The result has been clear and concise procurement documents.

Date When Full Compliance Will Be Achieved

Based on the corrective actions performed, RG&E achieved full compliance on disposition and 10CFR50.59 evaluation of NCR 90-140 on April 9, 1990.

Very truly yours,


Robert C. Mecredy

xc: U.S. Nuclear Regulatory Commission
Document Control Desk (Original)
Washington, D.C. 20555

NRC Senior Resident Inspector - Ginna Station

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