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September 19, 1990

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

Subject: Response to Maintenance Activity Weaknesses Identified
in 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 Inspection Report 50-244/90-80, requested notification in writing of actions taken or planned in order to enhance maintenance activities relative to the weaknesses described in Attachment 4. The following response is being submitted to address each of the three weaknesses described.

Weakness Number 1

"Maintenance records are difficult to retrieve".

Rochester Gas and Electric has previously recognized difficulties with information retrieval and initiated efforts to develop a comprehensive information system. Several individual module development efforts (initiated up to two years ago) are now approaching completion. The focal point of each of these modules is the equipment identification number (EIN). The EIN'S for components were/are being established during the Piping and Instrumentation Drawing (P&ID) and Electrical Controlled Configuration Drawing (ECCD) upgrade and the Ginna Master Equipment Data Base development.

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Page 2
50-244/90-80
September 19, 1990

Information modules now in use include the computerized Work Order Tracking System (WOTS) and Material Management System (procurement, generic part, and bill of materials information). Equipment information retrieval has been substantially improved with the implementation of these two modules alone.

Information system modules under development and other efforts which will improve information retrieval include:

- a. Computer Assisted Retrieval, Micro Form Based, Record Management System (for permanent record retention and retrieval).
- b. A Computerized "Q" list.
- c. Vendor Manual Upgrade.
- d. Formation of a Nuclear Engineering/Records Management AD HOC Group to analyze and resolve document control issues including information retrieval and vendor drawing control/management.
- e. Configuration Management Information System (CMIS) (the final integration of the individual information modules into a single computer system.)

Continued implementation of information systems as they are developed will progressively enhance information retrieval pending completion of the CMIS presently scheduled for February 20, 1993.

Reference: March 6, 1990 meeting minutes, RG&E presentation to the NRC at Region 1 Headquarters.

Weakness Number 2

"The potential exists for miscommunication due to sound powered phone limitations".

Rochester Gas and Electric agrees that the single channel sound powered phone system presents communication limitations during the period of heavy use associated with maintenance and testing activities encountered during the refueling outage. To overcome this congestion, a multi-channel communications system is being investigated. It would operate on existing wiring and would provide four or five available channels.

In addition, a communication standard will be developed for maintenance personnel to provide direction for clear and concise verbal communications when utilizing the sound powered phone system. Applicable personnel will be trained to this standard prior to the 1991 Annual Refueling Outage.



Page 3
50-244/90-80
September 19, 1990

Weakness Number 3

"There has been a lack of evaluation of total training needs".

Rochester Gas and Electric will review and update as necessary the Nuclear Training Manual (NTM) program descriptions related to maintenance personnel. This review will ensure that the descriptions clearly reflect the training program that is being implemented and will be completed prior to the 1991 Refueling Outage. Additionally, Ginna Station management has retained a consultant to conduct a training need analysis for HVAC, Planners, Foreman, Stockroom personnel, and other applicable groups not currently in accredited training program. Based on the analysis, necessary lesson plans will be identified for development prior to the 1991 Refueling Outage.

Very truly yours,


Robert C. Mecredy

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NRC Senior Resident Inspector - Ginna Station