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 CIL: 50-244 Robert Emmet Ginna Nuclear Plant, Unit 1, Rochester G 05000244
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 JOHNSON, A.R. Project Directorate I-3

SUBJECT: Responds to NRC 910821 & 900509 ltrs re violations noted in
 EDSFI Rept 50-244/91-80 & Insp Rept 50-244/89-81,
 respectively. Corrective actions: new molded-case circuit
 breaker will be tested during 1993 refueling outage.

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May 8, 1992

U.S. Nuclear Regulatory Commission
Document Control Desk
Attn: Allen R. Johnson
Project Directorate I-3
Washington, D.C. 20555

Subject: Update/Extension Request for Corrective Actions to be
Taken in Response to Notice of Violation - Molded Case
Circuit Breaker Testing - NRC Inspection Report No. 50-
244/89-81-06 dated May 9, 1990
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

Ref. (a): Letter dated August 21, 1991 from M. W. Hodges, NRC, to
RG&E, Subject - Electrical Distribution System Functional
Inspection for Ginna Nuclear Power Station (Report No.
50-244/91-80)

Dear Mr. Johnson:

On page 27 of reference (a), the NRC closed Violation 50-244/89-81-
06 pertaining to a lack of scheduled periodic testing of Class 1E
480 V molded case circuit breakers (MCCB) as follows:

"In response to the NOV, the licensee stated that it was developing
appropriate test methods for MCCBs as part of the Reliability
Centered Maintenance (RCM) program. Corrective Action Report 1985
was initiated to formally track and address the lack of MCCB
testing. A corrective action plan was developed to systematically
evaluate the identified violation. This consisted of:"

"Initiation of a program for periodic MCCB testing by the next
refueling outage."

"The team concluded that the corrective action plan initiated to
address the lack of MCCB testing was comprehensive and addressed
the essential elements to develop an effective testing program.
Based on the licensee's continuing MCCB test program development
and the revision of appropriate test procedures, this violation is
closed."

Since the "next refueling outage" referred to above is the 1992
Refueling Outage, RG&E is providing the following update/extension
request for corrective actions to be taken in response to Violation
50-244/89-81-06:

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- 1) Development of the MCCB test program is in progress and is being coordinated with Reliability Centered Maintenance (RCM) program commitments as well as the Maintenance Procedure Upgrade Project (MPUP) schedule. The RCM preventive maintenance (PM) enhancements and the MCCB testing program are being implemented into interactive PM procedures. The RCM project has a MCCB PM initiation date of 12/31/92. Current plans are to procure MCCB test equipment and finalize procedures for the MCCB program during 6/92 - 8/92.
- 2) To gain breaker testing experience, a non-safety related MCC will be tested first under the new program. In keeping with the EPRI breaker maintenance guidelines, the initial testing will proceed cautiously and will not be conducted during a plant outage. This will facilitate resource allocation and keep the initial testing from becoming a critical path activity. Initial MCCB testing will be conducted sometime late in 1992.
- 3) Scheduling for safety related MCC's will be completed by 12/92. Testing of safety related MCC's will be initiated during the 1993 refueling outage.

Very truly yours,



Robert C. Mecredy

GJW\225

xc: Mr. Allen R. Johnson (Mail Stop 14D1)
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Washington, D.C. 20555

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Ginna Senior Resident Inspector

