

ACCELERATED DOCUMENT DISTRIBUTION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9308040231 DOC. DATE: 93/07/26 NOTARIZED: NO DOCKET #
 FACIL: 50-244 Robert Emmet Ginna Nuclear Plant, Unit 1, Rochester G 05000244
 AUTH. NAME: AUTHORITY: R.C. AUTHORITY: R.C. AUTHORITY: R.C.
 RECIP. NAME: RECIP. NAME: JOHNSON, A.R. RECIP. NAME: JOHNSON, A.R.
 AUTHORITY: R.C. AUTHORITY: R.C. AUTHORITY: R.C.
 RECIP. NAME: RECIP. NAME: JOHNSON, A.R. RECIP. NAME: JOHNSON, A.R.
 AUTHORITY: R.C. AUTHORITY: R.C. AUTHORITY: R.C.
 RECIP. NAME: RECIP. NAME: JOHNSON, A.R. RECIP. NAME: JOHNSON, A.R.

SUBJECT: Responds to NRC 930624 ltr re violations noted in insp rept
 50-244/93-10 on 930423-0609.C/As: Site Fire Protection
 Engineer issued ltr to all shop foremen, on 930611 to share
 w/personnel lessons learned from recent fire problems.

DISTRIBUTION CODE: IE01D COPIES RECEIVED: LTR 1 ENCL 0 SIZE: 3
 TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

NOTES: License Exp date in accordance with 10CFR2,2.109(9/19/72). 05000244

RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
PD1-3 PD	1 1	JOHNSON, A	1 1
INTERNAL: AEOD/DEIB	1 1	AEOD/DSP/ROAB	1 1
AEOD/DSP/TPAB	1 1	AEOD/TTC	1 1
DEDRO	1 1	NRR/DORS/OEAB	1 1
NRR/DRCH/HHFB	1 1	NRR/DRIL/RPEB	1 1
NRR/DRSS/PEPB	1 1	NRR/PMAS/ILPB1	1 1
NRR/PMAS/ILPB2	1 1	NUDOCS-ABSTRACT	1 1
OE DIR	1 1	OGC/HDS1	1 1
REG FILE 02	1 1	RES/HFB	1 1
RGNI FILE 01	1 1		
EXTERNAL: EG&G/BRYCE, J.H.	1 1	NRC PDR	1 1
NSIC	1 1		

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK,
 ROOM P1-37 (EXT. 504-2065) TO ELIMINATE YOUR NAME FROM DISTRIBUTION
 LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 22 ENCL 22





ROCHESTER GAS AND ELECTRIC CORPORATION • 89 EAST AVENUE, ROCHESTER N.Y. 14649-0001

ROBERT C. MECREDDY
Vice President
Ginna Nuclear Production

TELEPHONE
AREA CODE 716 546-2700



July 26, 1993

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

Subject: Reply to a Notice of Violation
NRC Inspection Report No. 50-244/93-10,
dated June 24, 1993
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Johnson:

During an NRC Inspection conducted on April 23, 1993 to June 9, 1993, one violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below:

"Technical Specifications, paragraph 6.8.1 states, in part: "Written procedures shall be established, implemented, and maintained covering...Fire Protection Program implementation..." A procedure that implements the Fire Protection Program, Ginna Station Procedure No. A-905, "Open Flame, Welding and Grinding Permit (Hot Work Permit), paragraph 3.3 states, in part: "The work area will be inspected by Fire Protection and Safety personnel and the following conditions shall be satisfied before work commences...Any openings into adjoining areas within a thirty-five foot radius shall be closed and/or a second firewatch established..."

9308040231 930726
PDR ADOCK 05000244
Q PDR



1201
1/0

Contrary to the above, on June 7, 1993, grinding work was conducted on the sill of a closed fire door between the turbine building and the intermediate building without the appropriate fire prevention controls being implemented to prevent sparks from entering into the intermediate building where safety related equipment is located, including a second firewatch established in the intermediate building to monitor for the presence of sparks.

Rochester Gas and Electric Corporation (RG&E) agrees the violation occurred.

This event was identified by the NRC Resident Inspector during a routine plant tour. During the NRC Resident's tour, he observed sparks entering the Intermediate Building from underneath fire door S36F, an infrequent access door to the Turbine Building.

The following is RG&E's reply to this statement of violation:

1. Reason for the violation:

RG&E investigations have determined the following cause for the violation:

- o During Fire Protection personnel's pre-inspection of the job site, the effect of a normal gap under the fire door was not considered. It had been perceived that the wall and door provided a barrier to prevent the transmission of potential ignition sources, when performing hot work activities. Therefore, no fire prevention measures were instituted on the Intermediate Building side of fire door S36F.

2. Corrective steps that have been taken and the results achieved:

Upon notification to the Site Fire Protection Engineer of the situation, immediate action was taken to station a firewatch on the Intermediate Building side of the door, per Administrative requirements.

3. Corrective steps that will be taken to avoid further violations:

An awareness critique with Fire Protection personnel was conducted on June 10, 1993 to heighten their awareness with regards to fire protection requirements. Recent fire protection problems were discussed at this meeting, including this violation and the corrective steps necessary to prevent recurrence. Corrective steps include:

- o All personnel present were informed that all doors may have gaps, such that they do not provide a barrier to prevent the transmission of potential ignition sources, when performing hot work activities. In order to mitigate this hazard, a firewatch will be posted on the opposite side of the door, or a weld blanket shielding the door and all openings will be provided.
- o All personnel present were informed that when they are inspecting the hot work activity site, they must take the time to ensure all fire hazards are removed or protected within 35 feet of the site, prior to the starting of the hot work activity.

The Site Fire Protection Engineer issued a letter to the Training Department, on June 10, 1993, requesting appropriate changes to the fire protection section of the General Employee Training Lesson Plan, to heighten all plant personnel's awareness of fire protection requirements. Implementation of these changes is tracked by Corrective Action Report 2076.

The Site Fire Protection Engineer issued a letter to all Shop Foreman, on June 11, 1993, to share with their personnel the lessons learned from the recent fire protection problems and the corrective action that must be taken to prevent recurrence.

4. The date when full compliance will be achieved:

Full compliance was achieved June 7, 1993 when a firewatch was stationed on the Intermediate Building side of the door.

Very truly yours,


Robert C. McCreedy

xc: Mr. Allen R. Johnson (Mail Stop 14D1)
PWR Project Directorate I-3
Washington, DC 20555

U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

U.S. NRC Ginna Senior Resident Inspector