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AUTH.NAME AUTHOR AFFILIATION
MECREDY,R.C. Rochester Gas & Electric Corp.
RECIP.NAME RECIPIENT AFFILIATION
JOHNSON,A.R. Project Directorate I-3

SUBJECT: Submits response to violations noted in Insp Rept
50-244/94-17. Corrective actions: items identified by
inspector appropriately capped, plugged or sealed.

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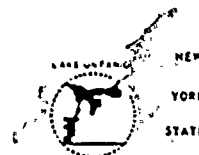
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August 26, 1994

U.S. Nuclear Regulatory Commission
Document Control Desk

Attn: Allen R. Johnson
PWR Project Directorate I-3
Washington, D.C. 20555

Subject: Reply to a Notice of Violation
Ginna Procurement Inspection 94-17,
dated July 15, 1994
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Johnson:

During an NRC inspection conducted from June 27 through July 1, 1994, a 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:

"10 CFR 50, Appendix B, Criterion VIII, states, in part, "Measures shall be established for the identification and control of materials, parts, and components..." and Criterion XVI, states, in part, "Measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected." Ginna Station, "Quality Assurance Manual," Section No. 13, "Handling, Storage, and Shipping" requirement that states, in part, "...procedures shall require adherence to supplier's requirements or alternate requirements so that the quality of items is maintained while they are handled or stored prior to installation or use," and "Deficiencies noted during periodic inspections of storage areas shall be documented and corrected." Ginna Procedures A-407, "Evaluation of Items for In-Storage Maintenance Requirements," A-701, "Receipt and Acceptance of Materials/Parts," and A-1501, "Control of Non-Conforming Materials," implement the above requirements.

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Contrary to the above, as of July 1, 1994, handling, preservation, storage, cleaning, packaging, and inspection activities associated with safety-related items were not properly performed by the Inventory Control personnel in the Ginna Station Level B storeroom in that: (1) items were not stored with protective caps and plugs; (2) items were not cleaned before being stored in the storage area; and (3) nonconforming items were not reported on a nonconformance form by Material, Procurement, and Budget personnel, nor by Quality Assurance personnel as required by Ginna Station Procedure A-1502, "Nonconformance Reports."

This is a Severity Level IV violation (Supplement 1)"

The response to the violation is provided separately for each of the three conditions stated.

A. Response for Items Stored Without Caps and Plugs

(1) The reason for the violation, or, if contested, the basis for disputing the violation:

Rochester Gas and Electric Corporation (RG&E) accepts the violation, and acknowledges that some items were not stored with protective caps, plugs, or seals. At the time of the NRC inspection, an existing and ongoing packaging upgrade program was in place, and the initial upgrading of packaging had not yet been completed for all items. Therefore, there were still some items, as identified by the inspector, that had not been adequately capped, plugged, or sealed.

(2) The corrective steps that have been taken and the results achieved:

The items identified by the inspector were appropriately capped, plugged, or sealed. Management completed a comprehensive inspection of materials in various storage areas to assess the extent of the missing caps, plugs, and seals. The results indicated that there were only a few isolated cases of missing caps, plugs, or seals. All of these deficiencies were immediately corrected. Management expectations and standards regarding the importance of caps, plugs, or seals have been reaffirmed to the Inventory Control organization.

(3) The corrective steps that will be taken to avoid further violations:

The packaging upgrade program will continue. Inventory Control management will periodically perform inspections of materials in selected storage areas to assess the effectiveness of packaging. Inventory Control training modules will be reviewed to ensure the issue of adequate packaging is addressed. Quality Assurance will perform an assessment of these corrective steps.

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- (4) The date when full compliance will be achieved:

Full compliance was achieved for those items with identified cap, plug, or seal deficiencies on July 18, 1994, when these deficiencies were corrected.

B. Response for Items not Cleaned Before Being Stored

- (1) The reason for the violation, or, if contested, the basis for disputing the violation:

RG&E accepts the violation, and acknowledges that some Foxboro modules were physically located in the Level B storeroom and had not been cleaned. The items were in the storage area awaiting formal processing and integration into existing stock and thus had not been cleaned. These modules still had an existing film of dust on the terminal ends.

- (2) The corrective steps that have been taken and the results achieved:

The modules were cleaned to conform to the requirements for a Level B Storage Area. Management performed a representative sampling of items in various storage areas, to assess the extent of cleanliness concerns. No other items were identified as not being cleaned. Management expectations and standards regarding the importance of cleanliness of items in Level B storage areas have been reaffirmed to the responsible organization.

- (3) The corrective steps that will be taken to avoid further violations:

Quality Assurance will perform an assessment of the cleanliness of items located in storage areas. Inventory Control training modules will be reviewed to ensure the issue of cleaning of items, prior to items being physically located in storage areas, is addressed.

- (4) The date when full compliance will be achieved:

Full compliance was achieved on July 7, 1994, when these Foxboro modules were cleaned.

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C. Response for Nonconforming Items not Reported

- (1) The reason for the violation, or, if contested, the basis for disputing the violation:

RG&E acknowledges that a nonconformance report (NCR) was not initiated for grease seepage from some Limitorque limit switches that were in storage. This seepage was previously identified by RG&E personnel, who immediately contacted appropriate RG&E and site technical personnel to determine the possible need for the initiation of an NCR. In accordance with administrative procedure A-1502, "Nonconformance Reports", a determination was made that the grease seepage was not a condition deleterious to the limit switches, was not a nonconforming condition, and, therefore, did not constitute a violation of requirements.

- (2) The corrective steps that have been taken and the results achieved:

As a result of this NRC inspection, NCR 94-114 was initiated by Inventory Control to report this condition. This NCR has been processed. The results confirm that no nonconforming condition existed, and that an NCR was not appropriate for the identified condition. RG&E received documentation from the manufacturer's engineering organization substantiating the conclusion that seeping grease is not an issue of concern.

The manufacturer stated that it is a characteristic of this grease that some oil may separate from the grease base when the grease is dormant for extended periods. Separation of oil and grease should be expected when a geared limit switch is in storage for long periods. This separation is not detrimental to the function of the switch. When a switch is to be removed from storage to be placed in service, the switch should be wiped to remove any accumulation of oil which may have occurred during storage.

Management investigated Inventory Control's understanding of the nonconformance report program and reviewed NCRs that had been initiated by Inventory Control in the past. The results indicated to management that Inventory Control personnel have an acceptable level of understanding of the nonconformance report program.

- (3) The corrective steps that will be taken to avoid further violations:

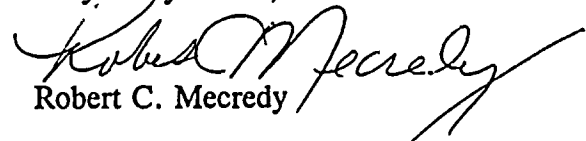
Based on the results of the actions taken, no further corrective steps are needed.

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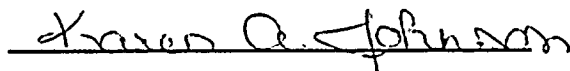
(4) The date when full compliance will be achieved:

RG&E has been, and continues to be, in full compliance.

Very Truly Yours,


Robert C. Mecredy

Subscribed and sworn to before me
on this 26th day of August, 1994



KAREN A. JOHNSON
Notary Public in the State of New York
WAYNE COUNTY
My Commission Expires 2-16-95

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

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

Ginna USNRC Senior Resident Inspector