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March 13, 1998

U.S. Nuclear Regulatory Commission  
Document Control Desk  
Attn: Guy S. Vissing  
Project Directorate I-1  
Washington, D.C. 20555

Subject: Reply to a Notice of Violation  
NRC Integrated Inspection Report 50-244/97-12 and Notice  
of Violation, dated February 9, 1998  
R.E. Ginna Nuclear Power Plant  
Docket No. 50-244

Dear Mr. Vissing:

Rochester Gas and Electric (RG&E) provides this reply within 30 days of receipt of the letter which transmitted the Notice of Violation. During an NRC Inspection conducted on November 17 - January 4, 1998, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violation is listed below:

"10 CFR 50, Appendix B, Criterion V requires that activities affecting quality be prescribed and accomplished in accordance with documented procedures and instructions, and that these procedures include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.

Nuclear Directive ND-MAI, "Maintenance," required that unexpected problems be documented, and that any deficiencies identified be reported in accordance with the Corrective Action Program.

Maintenance Procedure M-15.1M, "A or B Diesel Generator Mechanical Inspection and Maintenance," step 5.20.1.h required that the emergency diesel generator highest and lowest firing pressures be recorded at full engine load, and specified that the difference between the highest and lowest pressures must not exceed a maximum of 150 pounds per square inch.

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Contrary to the above, on May 3, 1996, and November 11, 1997, the acceptance criteria in maintenance procedure M-15.1M were not met during post-maintenance testing of the B-emergency diesel generator (B-EDG). In both instances, the difference between the highest and lowest firing pressures for the B-EDG engine was recorded above the maximum allowable limit specified by procedure M-15.1M. The unacceptable data was not resolved in accordance with the licensee's Corrective Action Program, or justified and documented as acceptable before the B-EDG was returned to service."

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

Rochester Gas & Electric Corporation (RG&E) accepts the violation. We acknowledge that EDG performance data was not properly resolved relative to established acceptance criteria and the Corrective Action Program.

The collection of EDG firing pressure data is based on guidance from the EDG vendor manual. Historically, such data was collected and documented in Maintenance Procedure M-15.1.2, "A or B Diesel Generator - Obtain Cylinder Firing Pressure at Full Load", at the same time as periodic testing of the EDG was being performed (using Surveillance Test Procedure PT-12.1 or PT-12.2, "Emergency Diesel Generator A" and "Emergency Diesel Generator B"). The data collection was scheduled prior to planned EDG maintenance overhauls. This data was one of the sole indicators of EDG condition, and was provided to the original equipment manufacturer (OEM) field services representative for use in planning any needed maintenance during the subsequent overhaul. The OEM representative is contracted to provide guidance and be present during the EDG maintenance overhaul.

After completion of EDG maintenance overhauls, data (to verify that proper adjustments and engine performance are acceptable) is obtained during the restoration of the EDG to service. Procedures PT-12.1 or PT-12.2 are used for post-maintenance testing (PMT) and operability performance testing (OPT). Documentation of the firing pressure is recorded in Maintenance Procedure M-15.1M, "A or B Diesel Generator Mechanical Inspection and Maintenance", at this time.

In the past two years, Ginna Station has taken additional measures to determine EDG engine condition by contracting with an EDG engine analysis contractor. This type of engine analysis has gained increasing acceptance within the nuclear power industry, and has been endorsed by the ALCO Owner's Group.



The engine analysis contractor assists RG&E personnel in performing state-of-the-art condition monitoring, both prior to and following EDG maintenance overhauls. This monitoring includes enhanced diagnostic testing, and provides many of the parameters to assist in determining engine performance. Maintenance procedures have not totally reflected the new methodology for data collection and its applicability to engine performance.

The data collected, that was above the maximum allowable limit, was obtained with the concurrence of the OEM field services representative, the engine analysis contractor, and the System Engineer. This data was reviewed in conjunction with determining the overall engine performance. The representative was knowledgeable of these parameters, and was aware of the basis for the firing pressure limits. Nevertheless, this out-of-specification data was recorded and not properly resolved in accordance with the Ginna Station administrative procedures, in that the RG&E maintenance personnel inappropriately accepted the data, based on the apparent acceptance of the data by the contractor and engineering personnel.

- (2) the corrective steps that have been taken and the results achieved:
  - o The EDG mechanic was counselled by the Manager, Mechanical Maintenance on the policy for resolution of data outside acceptance criteria.
  - o ACTION Report 97-2095 was initiated to resolve the specific data within the work package and to initiate cause investigation for not using the Corrective Action Program for resolution of the data.
  - o The EDGs were retested in February 1998 in the presence of the engine analysis contractor. RG&E and contractor personnel determined the operational performance of the EDG's to be satisfactory.
- (3) the corrective steps that will be taken to avoid further violations:
  - o ACTION Report 97-2095 resulted in a Training Work Request (TWR), which was initiated to develop specific training in the proper resolution of out-of-specification results from field data collection.

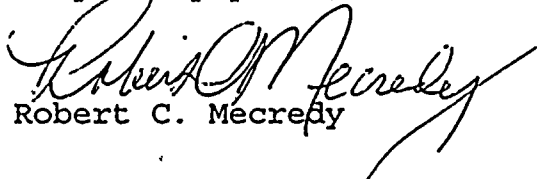


- o This training will be provided for all appropriate Maintenance personnel. The training will review applicable Nuclear Directives and Interface Procedures, and the responsibilities of RG&E personnel when vendor representatives are involved in oversight of work. This training will be completed by October 1, 1998.
- o Data collected during recent EDG maintenance and testing will be reviewed. Any anomalies will be entered into the Corrective Action Program for resolution. This review will be completed by March 31, 1998.

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

Full compliance was achieved on December 2, 1997, when ACTION Report 97-2095 was written, initiating resolution of the unacceptable data within the Corrective Action Program.

Very truly yours,

  
Robert C. Mecredy

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