



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

JOHN E. MAIER
Vice President

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January 27, 1983

Mr. Ronald C. Haynes, Regional Administrator
U.S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

Subject: I & E Inspection Report 82-24
Notice of Violations
Failure to Post Firewatch and Failure to Perform Surveillance
Test Within Test Frequency
R. E. Ginna Nuclear Power Plant, Unit No. 1
Docket No. 50-244

Dear Mr. Haynes:

In accordance with the above subject which stated

"As a result of the inspection conducted on November 1, 1982 through December 5, 1982, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C) published in the Federal Register on March 9, 1982 (47 FR 9987), the following violations were identified:

- A. Technical Specification 3.14.3.1 requires that with the Intermediate Building Cable Tray Spray System (S15) inoperable, a continuous fire watch must be posted within one hour.

Contrary to the above, during the period 12:01 P.M., November 16 through 7:00 A.M., November 17, 1982, the Intermediate Building Cable Tray Spray SYSTEM (S15) was inoperable with no fire watch posted.

- B. Technical Specification 4.1.1 requires a surveillance test of the loss of voltage/degraded voltage protection for the four 480 volt safeguard buses at least every thirty-one days ± 25%.

Contrary to the above, as of October 28, 1982, the surveillance test frequency of the loss of voltage/degraded voltage protection for three of the four 480 volt safeguard buses exceeded thirty-one days ± 25% by three days.

the following is submitted in response.

Corrective actions for these violations are as follows:

- A. The corrective actions that have been implemented as of January 25, 1983 have been to revise the Fire Signal System Detection Zone Disconnect/Reconnect Procedure SC-3.16.2.4 for fire detection systems S01, S03, and S04.

A Modification Follow Program has been implemented to have plant personnel involved in Plant Modifications. This program will help mitigate communication problems between Plant Personnel, Project Construction Personnel, and Engineering Personnel.

Administrative Procedure A-52.4 has been revised to have the Cognizant Shift Supervisor determine the operability of a system and/or component and to determine what type of fire watch coverage is deemed necessary.

The Fire Protection and Safety Coordinator and Cognizant Operations personnel have had discussions concerning fire watch coverage that is deemed necessary.

Future corrective actions to be implemented will be to make additional revisions to the Fire Signal System Detection Zone Disconnect/Reconnect Procedure to include all fire detection zones and to send a memo stating the Operations Manager, Operations Supervisor, and Shift Supervisor are the only plant personnel who can declare a system and/or component operable or inoperable.

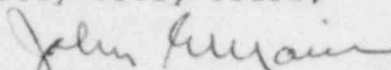
- B. The corrective actions that have been implemented as of January 25, 1983 have been to use a scheduling board as the primary tracking method for being cognizant of Periodic Test requirements.

A Master Log of all tests to be performed is a back-up tracking method used by the Results and Test Department to stay cognizant of testing requirements. A remarks column has been added to this log to show partial tests that have been performed. This log is verified by three Results and Test Technicians.

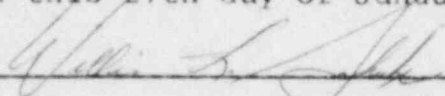
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The Results and Test Supervisor also has a Master Log of required tests and verifies his log with the Results and Test Master Log for consistency. This is essentially a triple verification process.

Very Truly Yours,


John E. Maier

Subscribed and sworn to me
on this 27th day of January 1983



WILLIS L. SCHULZE
NOTARY PUBLIC, State of N.Y., Monroe County
My Commission Expires March 30, 1983