



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

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April 22, 1983

Mr. James M. Allan, Acting Regional Administrator  
U.S. Nuclear Regulatory Commission  
Region I  
631 Park Avenue  
King of Prussia, Pennsylvania 19406

Subject: I & E Inspection Report 83-03  
Notice of Violations  
Inadequate Implementation of NRC Reporting Requirements  
R. E. Ginna Nuclear Power Plant, Unit No. 1  
Docket No. 50-244

Dear Mr. Allan:

In accordance with the above subject which stated;

"As a result of the inspection conducted on February 1, 1983 through February 28, 1983, 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 6.9.3.b requires that semi-annually a report be submitted to the NRC documenting, in part, the total radioactivity (in curies) of liquid effluents released to the unrestricted area during the previous six months of operation.

Contrary to the above, the report submitted to the NRC on February 28, 1983, for the period of July-December 1982, did not include the total radioactivity of liquid effluents released, in that the radioactive liquid effluent from the steam generator blowdown sample line released to the unrestricted area was not considered.

- B. 10 CFR 50.59 requires that a report be submitted annually to the NRC containing a brief description and summary of the safety evaluation for each facility change, test and experiment which was determined not to involve an unreviewed safety question.

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Contrary to the above, as of February 28, 1983 a report had not been submitted to the NRC for facility changes, tests and experiments performed during 1981 which were determined not to involve an unreviewed safety question.

- C. Technical Specification 3.6.3.1 states, in part, that with a containment isolation valve inoperable, power operation may continue provided that the valve is returned to operable status or the affected penetration isolated within four hours.

Technical Specification 5.9.2.6.2 requires, in part, that a written report be submitted to the NRC within thirty days following a condition leading to operation in a degraded mode permitted by a limiting condition for operation.

Contrary to the above, as of February 28, 1983 a written report had not been submitted documenting that on December 19, 1982, a containment isolation valve in the nitrogen supply line to the Accumulators (V846) was declared inoperable and the affected penetration isolated within four hours as required.

the following is submitted in response.

Corrective action to address these violations are as follows:

For violation A, the steam generator blowdown samples, which release to the discharge canal, were not reported as part of the semi-annual effluent report due to an omission from the monthly effluent calculation procedures. A calculation of the total released during the last reporting period indicates that approximately 0.21 mCi (gross activity) was released during the period from July through December, 1982. A calculation based on isotopic analysis and monthly releases will be performed for the period since the initiation of the B steam generator leak. This information will be provided in the next semi-annual effluent report.

A Technical Staff Request was submitted and sent to Engineering on March 28, 1983 to have the discharge from the blowdown monitors directed to the drain line from the secondary sample panel. This will allow the blowdown to be directed either to the hotwell for reclaim or the retention tank for discharge. Both of these routes are included in the normal effluent calculations. If the reroute does not occur prior to start up, the steam generator blowdown sample discharge will be included in the effluent calculation procedure. Either of the above changes would preclude recurrence of this problem.

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For violation B, the Administrative Manager has been assigned the responsibility for preparation of Annual Reports. This individual has also been made aware of the requirement for submission of the Annual Report by the last day of March of the following year for which the report is addressing. Due to past annual reports, which contained information not relevant to the subject of the report, a new report format needed to be developed. This task has been completed and the 1981 Annual Report shall be submitted within thirty (30) days of the date of this letter. In addition, the 1982 Annual Report shall be submitted within thirty (30) days of the date of this letter.

For violation C, the Plant Superintendent discussed this Technical Specification with the Plant Operations Review Committee on April 6, 1983. The Superintendent stressed that reporting requirements should be considered each time an "action" is required by the limiting conditions for operations portion of the Technical Specifications. Past interpretations were such that if continued operations were allowed through "options" available for a means of meeting Technical Specifications, that the event would not be reportable. The reporting requirements of each Technical Specification needs to be carefully considered regardless of previous interpretations. In addition, an LER on this specific event will be submitted within thirty (30) days of the date of this letter.

Very Truly Yours,

*John E. Maier*  
John E. Maier

Subscribed and sworn to me  
on this 22nd day of April, 1983

*Richard F. Laitenberg*

RICHARD F. LAITENBERGER  
Notary Public State of New York  
Monroe County, N.Y.  
Commission Expires March 30, 19 86  
Reg. No. 2235125