



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

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July 21, 1983

Dr. Thomas E. Murley, Regional Administrator
U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

Subject: I & E Inspection Report 83-16
Notice of Violations
Post Maintenance Testing Requirements
R. E. Ginna Nuclear Power Plant, Unit No. 1
Docket No. 50-244

Dear Dr. Murley:

In accordance with the above subject which stated

"10 CFR 50, Appendix B, Criterion V states in part,
"Activities affecting quality shall be prescribed
by...procedures...and... shall include appropriate
quantitative or qualitative acceptance criteria for
determining the important activities have been satisfactorily accomplished."

Administrative Procedure-502, Plant Procedure Content and Format Requirements, Revision 21, states that maintenance procedures shall include applicable post maintenance testing requirements to verify acceptability of the maintenance performed.

Contrary to the above, Maintenance Procedure (M)-53, Containment Air Locks Inspection & Maintenance, Revision 6, did not require the proper post maintenance testing to verify acceptability of the major maintenance completed on the containment personnel air lock on October, 1982."

the following is submitted in response.

Subsequent to LER 83-12/03L and prior to the Enforcement Conference of June 1, 1983, Maintenance Supervision completed a review of M-53 and all other safety related

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maintenance procedures where post maintenance testing is required. As a result, M-53 and many other maintenance procedures have been revised. New steps in the revised procedures require verbal notification to Test and Results personnel with information as to what maintenance was performed. Maintenance personnel document the occurrence of verbal notification in the maintenance procedure. Additional steps in the maintenance procedures require that Test and Results document their determination of the appropriate testing required. Many of these revised procedures were utilized during the recently completed refueling outage with effective results.

We plan to ensure adequate management controls exist for the maintenance and post maintenance testing as follows:

In response to an NRC concern regarding the scope of maintenance procedures Maintenance Supervision has completed an initial review of all safety related maintenance procedures and has determined that the question regarding scope of maintenance procedures may be restricted to M-53 and thus be an isolated case. The large majority of all safety related maintenance procedures contain adequate information regarding scope and describe steps such that maintenance and post maintenance testing is adequately controlled. Nevertheless, Maintenance Supervision will perform a detailed review of the administrative controls covering requirements for format and content of maintenance procedures as prescribed in A-502, Plant Procedure Content and Format Requirements, and make revisions to A-502 as necessary. This will be completed by September 1, 1983.

To ensure that all safety related maintenance procedures are consistent with A-502, as it may be revised, regarding their scope and detail, each safety related maintenance procedure will be reviewed, in depth, and revisions made as deemed necessary by Maintenance Supervision. Because of the volume of maintenance procedures, this review will be completed by December 30, 1983.

In the interim, for all planned maintenance, Maintenance Supervision will review the safety related maintenance procedures to be used for the planned maintenance and make any necessary changes for proper work scope, detail and post maintenance testing, prior to starting the job.

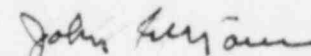
As was discussed by RG&E management at the Enforcement Conference, we are continuing to strengthen performance by the following actions:

Plant status meetings are held each weekday morning to improve communication between departments;

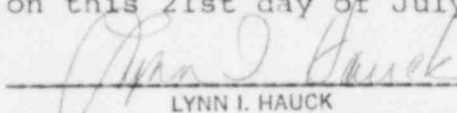
A modification-follow program has been developed to facilitate turnover of plant modification from the Project Group activities to the plant; and

A review sheet is being used in the RG&E routing of draft transmittals to the NRC to ensure cognizant personnel review correspondence for accuracy and completeness.

Very Truly Yours,


John E. Maier

Subscribed and sworn to me
on this 21st day of July 1983


LYNN I. HAUCK

NOTARY PUBLIC, State of N.Y., Monroe County
My Commission Expires March 30, 1984