



ROCHESTER GAS AND ELECTRIC CORPORATION • 89 EAST AVENUE, ROCHESTER, N.Y. 14649-0001

ROGER W. KOBER
VICE PRESIDENT
ELECTRIC & STEAM PRODUCTION

TELEPHONE
AREA CODE 716 546-2700

March 8, 1984

Dr. Thomas E. Murley, Regional Administrator
U.S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region I
631 Park Avenue
King of Prussia, PA 19406

Subject: I&E Inspection Report 83-24
Notice of Violation - Failure to Determine the Iodine
Removal Efficiency of the Post Accident Charcoal System
at 286°F as Required by Technical Specifications.

Dear Dr. Murley:

The Notice of Violation contained in Inspection Report
83-24 states the following:

"Contrary to the above, (Technical Specification 4.5.2.3.1.c)
the surveillance test performed on December 4, 1983 to
determine the iodine removal efficiency of the post accident
charcoal system was measured under test conditions of 266°F
rather than 286°F as required. Further, the test report
documenting the incorrect test temperature was reviewed
and accepted by supervisory personnel from two responsible
departments."

In accordance with our purchase order (PO Number N-EG-26852)
the contractor, Nuclear Consulting Services, Inc. (NUCON) was
requested to perform this analysis at 286°F. NUCON performs
similar analyses for several other nuclear power plants and
confused our test requirements with the standard requirements
for most other facilities. These standard requirements can
be found in NUREG-0452 Revision 4, "Standard Technical Specifications
for Westinghouse Pressurized Water Reactors", Regulatory Guide
1.52 Revision 2, March 1978, "Design, Testing, and Maintenance
Criteria for Post Accident Engineered-Safety-Feature Atmosphere
Cleanup System Air Filtration and Adsorption Units of Light-Water-
Cooled Nuclear Power Plants", ANSI N509-1976, "Nuclear Power
Plant Air Cleaning Units and Components" and RDT M16-1T, "Gas
Phase Adsorbents for Trapping Radioactive Iodine and Iodine
Compounds." These standard requirements specify a test temperature
as being equal to saturation temperature corresponding to a
pressure of 3.7 atmospheres (266°F). It should be noted that
these requirements are more restrictive than those found in
the Ginna Final Facility Description and Safety Analysis Report
(286°F) and actually resulted in a more conservative determination
of methyl iodide removal.

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PDR

DATE March 8, 1984
TO Dr. Thomas E. Murley, Regional Administrator

Supervisory personnel responsible for determining whether completed surveillance procedures satisfy Technical Specification requirements have been reminded of the importance of performing a thorough review. Additionally, the QA-07 form associated with the purchase order for NUCON's services has been modified to further define who is responsible for the review of test data. Full compliance has already been achieved.

Very truly yours,

Roger W. Kober
Roger W. Kober

RWK/lms

Subscribed and sworn to me on
this 8th day of March, 1984.

Richard F. Laitenberg

RICHARD F. LAITENBERGER
Notary Public State of New York
Monroe County, N.Y.
Commission Expires March 30, 1985
Reg. No. 2235125