



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

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January 27, 1984

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

SUBJECT: I & E Inspection Report 83-23
Notice of Violations
R. E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Dr. Murley:

In response to this inspection report, Rochester Gas and Electric has conducted a comprehensive reassessment of the modification process, and has formulated a six-part Modification Process Improvement Plan. This plan will coordinate several actions already in progress, and will provide for the implementation and evaluation of improvements to the process. The components of the plan are:

1. Improved involvement of plant personnel, as members of a Modification Follow Group.

In January 1983, the position of Liaison Engineer was expanded and significantly more manhours were allocated for performance of Liaison Engineer functions. Formerly, two individuals combined to provide about 3000 manhours per year for Liaison Engineer functions. After February, 1983, ten individuals were assigned, to provide approximately 8000 manhours per year. The Liaison Engineer was expected to form and to coordinate the activities of a Modification Follow Group. He was to coordinate the preparation of all SM procedures to control installation and testing of assigned modifications. He was to facilitate the flow of information between Ginna Station and Engineering, and between Ginna Station and Construction. He was to supervise the testing required to verify operability of new modifications.

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TO Dr. Thomas E. Murley

The concept of a Modification Follow Group (MFG) was established in early 1983. The MFG would be formed by the Liaison Engineer, with membership from Engineering, Project, and Ginna Station. My letter to R. C. Haynes, dated February 17, 1983, discusses MFG in more detail.

Administrative procedures will be revised to reflect the responsibilities of Liaison Engineers and Modification Follow Groups by March 2, 1984.

2. Develop programs for definition of the responsibilities for execution of a Startup Testing Program.

An "Ad-Hoc" Committee was established on August 10, 1983 to study startup testing and to make recommendations for improvements. As a result of the report of the Committee, the following actions are being taken:

- a. A permanent position (Electrical Test and Startup Engineer) was formally established to coordinate test and startup activities for electrical projects. For other projects, responsibility for this function is being reviewed and will be designated.
 - b. A Lead Test Supervisor is being assigned for each modification, to establish and execute a test plan for the assigned modification requiring startup testing.
 - c. A position has been established to administer and coordinate the test and startup program. An individual has been assigned to perform this function.
 - d. The Training Section will establish a Training Plan for modifications, beginning with modifications accomplished during the 1984 outage.
3. Develop definition of turnover, and define the criteria for various types of turnover.

In October, 1983, a task force was established to address this area. Management mandated that an improved program for turnover be in place during the 1984 refueling outage. This Task Force identified appropriate types of turnover and has drafted criteria for acceptance of a turnover and authority for offering and accepting a turnover. The Task Force is preparing a report, which will form the basis for this turnover program. In particular, the report will identify reviews required by PORC in order to place a system in service. This program will be implemented prior to startup from the 1984 refueling outage.

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4. Reassessment

RG&E management will monitor the adequacy of the program during the 1984 refueling outage. Prior to June 30, 1984, management will reassess the program, and direct that changes be made and training be provided where needed.

5. Develop administrative procedures to address the programs listed above.

Based on this reassessment, procedures will be written or revised to provide better definition of the roles of the Modification Follow Group, Liaison Engineer, Construction Engineer and Responsible Engineer. Procedures will also be written to formalize the Startup Testing Program. The turnover process will be formalized, and procedures written to control the turnover process. These procedures will be in place prior to September 30, 1984.

6. Conduct a Training Program

A comprehensive Training Plan will be developed to ensure that all affected individuals are trained to perform their function within the modification process. This Training Plan will be prepared after procedures are written, and training will be accomplished by November 30, 1984.

This Inspection Report addressed identified three violations. The first violation stated:

"A station modification, Post Accident Sampling System (PASS), was placed in service and considered operable without reviewing the SM procedure to ensure it had been completed as necessary for the modification to perform its intended function. Further, acceptable inspection and test results were not verified, in that open items resulting from walkdown inspections and field changes; surveillance and nonconformance reports; and QC functional testing concerns, were not adequately evaluated with regard to operability prior to placing the PASS in service."

To place the PASS modification into perspective, the major efforts of the Liaison Engineer and MFG involvement in early 1983 were directed toward new modifications; ongoing or nearly completed SM's (such as PASS) did not receive a comparable amount of involvement from Liaison Engineers. All significant PASS installation (except for installation of two valves and correction of construction punchlist items) had occurred between May, 1982 and January, 1983.

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The test program for PASS was carried out under the direct supervision of the Responsible Engineer. Results of tests were evaluated, as appropriate, by Results and Test Technicians, Construction Supervision, QC Technicians, Radiochemist, and the Responsible Engineer. In accordance with an NRC Confirmatory Order dated March 14, 1983, PASS was declared operable on July 15, 1983 to the extent necessary to satisfy regulatory requirements. Startup testing and some minor system changes continued after that date to optimize system performance since we had decided to install a system that would not only satisfy regulatory requirements but also would provide a state of the art system to fulfill normal analysis requirements. (See my letter dated November 4, 1983).

For every other current modification with significant testing (with the single exception of PASS), the Liaison Engineer was the individual assigned the responsibility for performance of testing. SM procedures to control and direct modification testing were prepared by and performed under the direction of a Liaison Engineer (except for PASS testing, where SM procedures were prepared by and performed under the direction of the Responsible Engineer).

Under the Modification Process Improvement Plan, responsibility for conducting modification testing will be assigned to the Lead Test Supervisor and the coordinator of the test and start up programs. This individual will ensure that the test plan is followed, and that procedures are implemented and adhered to in accordance with administrative requirements.

In response to the NRC concern for procedure review and supervisory reviews, hindsight indicates that PORC was not aggressive on July 13, 1983, in assuring themselves that the PASS was, in fact, operable. PORC members have since been reinstructed in their responsibilities. In addition, as described above, specific PORC responsibilities will be defined. (See item 3 of the plan.)

Since corrective actions have already been completed and reviewed by your staff, no response is required for the second violation.

The third violation stated:

"Technical Specification 6.8.3 states in part, that temporary changes to procedures may be made provided the intent of the original procedure is not altered and the change receives the necessary plant management approvals.

Technical Specification 6.8.1 states in part, "Written procedures shall be established, implemented and maintained..."

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Administrative Procedure (A)-503, Plant Procedure Adherence Requirements, Revision 6, March 2, 1983, paragraphs 3.1.1 through 3.1.1.3.1 requires that procedures in use must be completely filled out and signed off, allowing that a step may be marked "not applicable" provided a procedure change has been approved.

Contrary to the above, as of November 18, 1983 the following examples of failure to properly adhere to an administrative procedure were identified:

- Station Modification Procedure (SM)-2606.5D, Pre-Operational Test-Pass Waste Evacuating Compressor, Revision 0, December 3, 1982, performed January 14-15, 1983 contained numerous examples where portions of steps were crossed out or marked "not applicable" without a procedure change being initiated and approved.
- Separate pages from SM-2606.1, Mechanical Installation of the Post Accident Sampling System, Revision 0, and 1 were combined into one procedure instead of completely filling out and signing off each procedure separately. Similarly, separate pages from SM-2606.1A, Steam Generators 1A and 1B Blowdown Sampling Line Installation, Revision 0 and 1 were also combined."

The following is submitted in response:

Procedure SM-2606.5D was approved for use on December 3, 1982. Step 6.6 of this procedure states, "At the direction of the Start-up Engineer, it may be necessary to omit or change the order of steps in this procedure due to the sequence of construction activities." The Responsible Engineer, who performed the testing, assumed he had the authority to modify the test procedure to accomodate the status of this system at a particular point in time, regardless of the requirements of A-503.

To preclude recurrence, training has been accomplished in this area, for all Liaison Engineers. All other affected individuals will be trained as described in item 6 above. Existing plant Administrative procedures clearly limit the authority of any one individual to delete or cross out steps.

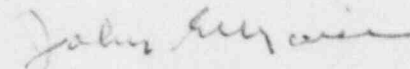
The practice of separating and recombining separate revisions of SM procedures developed over the past several years. The intent of this practice was to more clearly document the status of the SM procedure. This practice is contrary to A-503, and the Modification Contractor has been notified that this practice is unacceptable. In the future, when permanent revisions to SM procedures result in a new revision (procedure) being issued, additional changes to procedures will be accomplished to clearly

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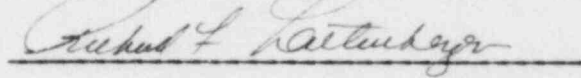
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authorize the completion (or marking "not applicable") of steps that are duplicated or altered by the revision.

Very truly yours,


John E. Maier

Subscribed and sworn to me
on this 27th day, January 1984



RICHARD F. LAITENBERGER
Notary Public State of New York
Monroe County, N.Y.
Commission Expires March 30, 19 85
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