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June 8, 1984

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 84-07
Notice of Violations
Conduct of Plant Operations Review Committee, Control
of Plant Procedures, and Conduct of Quality Assurance
Audits
R. E. Ginna Nuclear Power Plant, Unit No. 1
Docket 50-244

Dear Dr. Murley:

In accordance with the above subject which stated

"As a result of the inspection conducted on February 13, 1984 through March 1, 1984, 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 6.5.1.5 specifies that a PORC quorum consists of at least the chairman and (four) 4 members, no more than two of which may be alternates.

Contrary to the above, a PORC quorum was not indicated present for meetings 83-111 and 83-121.

- B. Technical Specification 6.8.2 and licensee procedure A-501, "Plant Procedures Preparation and Classification", Revision 2, require that procedures be approved prior to implementation.

Contrary to the above, on December 11, 1981, procedure PT-13.1.15, Revision 0, was used to perform a surveillance test on the Halon fire suppression system, although it was not approved for use by the Plant Superintendent

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until December 14, 1981.

- C. 10 CFR 50, Appendix B, Criterion XVI and the licensee Quality Assurance Manual, Section 16 require conditions adverse to quality be promptly identified and corrected.

Contrary to the above, the violations in paragraphs A and B above were identified during licensee quality assurance audits, but were not documented, evaluated or corrected by the licensee.

the following is submitted in response.

- A. With respect to meeting 83-111, a proper quorum attended this meeting. One alternate member's name was incorrectly typed in the wrong section of our minute's format under "Others Attending". When an alternate member attends a PORC meeting, and the regular member does not, the alternate is considered a voting member.

With respect to meeting 83-121, the quorum consisted of three (3) regular members and two (2) alternate members. One of the regular members administered the meeting in the absence of the chairman. This delegation of the chair is identified in our administrative procedures.

- B. Technical Specification 6.8.2 states "Each procedure and administrative policy of 6.8.1 above, and changes thereto, shall be reviewed by the PORC and approved by the Station Superintendent prior to implementation and reviewed periodically as set forth in the applicable procedures." Also, plant procedure A-501, Plant Procedure Preparation and Classification, states "Procedures shall be reviewed and approved for use prior to performing the activity in accordance with A-601. Plant procedure A-601, Plant Procedure Document Control, states "After all necessary signatures are on the coversheet, the PS (procedure specialist) shall indicate the Effective Date on the coversheet and distribute the procedure in accordance with A-602." Plant procedure A-602, Plant Procedure Distribution, states "Transmittal of all controlled copies shall be performed on the "Effective Date" of the procedures" and "Receipt and incorporation of the changes shall be accomplished for Control Copy #2 and #4 on the effective date, plus or minus one working day."

It is the policy of Ginna Station that the PORC Review Date and the Superintendent's signature on the coversheet

of a procedure documents the requirements for PORC review and plant superintendent's approval respectively. Therefore, once the appropriate signatures are on the coversheet, the procedure is approved for use. The act of placing an effective date on the coversheet by the procedure specialist is to document the formal distribution date, that date when adequate copies of a procedure are available for distribution and use. This date is when the various controlled copies of a procedure are either updated, or have been transmitted to control copy holders for updating of their copy. This practice precludes use of previous revisions which have been superceded in most situations and allows for early use of approved new procedures prior to formal distribution in emergency situations. In the future, to ensure procedure use and effective dates are compatible and previous revisions remain unavailable for use in all situations, distribution procedures are being revised to preclude use of equipment related procedures in advance of their effective date. This change when fully implemented by July 15, 1984 will necessitate distribution concurrent with need for use in situations involving need prior to routine distribution. It should also be noted that in all instances, the temporary change to procedures policy, as defined by Technical Specification 6.8.3 is still available for use by all plant personnel.

The procedure completed on December 11, 1981 had been previously distributed and satisfied all the requirements of Technical Specification 6.8.2 and Plant Procedure A-502. Although the December 14, 1981 effective date was somewhat in error, being 4 days after distribution, it had no impact on the related test activity as PT-13.1.15 was a new procedure eliminating any concern for a previous revision. This "futuristic" effective date is considered an isolated case with subsequent distributions concurrent with the effective date.

- C. Violation C is based primarily on the events associated with our handling of alleged violations of Technical Specification administrative requirements during internal audit 83-36 and reported in I & E Inspection Report 84-03. I & E Inspection Reports 84-03 and 84-07 describe two Technical Specification violations inappropriately handled during the audit process. Additionally, I & E Inspection Report 84-07 states that the audit findings on these items should have resulted in appropriate corrective action, when in fact the audit findings were not properly evaluated or resolved.

A thorough review of the audit documentation including draft reports, final reports, and notes associated with the resolution of the draft audit findings indicate that while timely corrective action may not have been taken with regard to the PORC quorum issue, we disagree that the related audit finding was inappropriately evaluated within the Quality Assurance audit organization. Additionally, all actions associated with the approved procedure concern were reviewed and resolved during the same time frame by the auditor supervision based on previous and current knowledge of the established procedure review and approval process which was confirmed with PORC members during a subsequent meeting.

It should be noted that the procedure approval concern, identified as Violation "B", was not raised during the conduct of an audit including audit 83-36 but in the response review consideration of an unrelated finding.

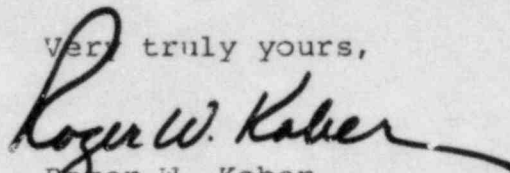
The PORC quorum concern presented at the October 12 exit meeting as draft AFCAR 5 was determined prior to report issuance to be an out of scope problem which is processed by other methods. The audit file clearly documents the October 25 supervisory review, bases, and recommendation that the problem be forwarded to Ginna Station QC in accordance with the established Corrective Action Procedure. CAR 1537 is currently tracking the investigation of the PORC quorum problem, the cause investigation and actions to preclude recurrence. Quality Assurance assessment, to date, indicates that the auditor attempted to notify the QC Engineer on November 10 nearly two (2) weeks after the audit report was issued. Discussion with the QC Engineer has indicated that he did not remember receiving notification and subsequently no action was taken. Actions to preclude recurrence have been taken within the audit organization during a recent auditor meeting which reviewed their handling of identified concerns and significant deviations found during audits or routine plant visits.

Your report identifies a few other examples of recent audit program deficiencies which has raised a concern over the effectiveness of the audit program. As a result of deficiencies identified in I & E Inspection Report 83-23, audit conduct has received closer supervisory review. Subsequent Modification Project audits are being better prepared and making better use of checklists. The audit program is sufficiently comprehensive to

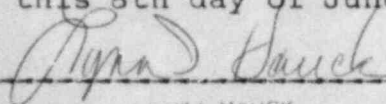
identify deficiencies in safety related construction, testing and turnover activities. The annual audit program evaluation presented to management in January have resulted in Ginna actions which intend to eliminate overdue responses and facilitate timely corrective action. Early indications verify that these new Ginna actions are being effectively implemented. Increased communications during the audits have also been stressed in attempt to achieve finding acknowledgement prior to receipt of the report. This will not only facilitate timely corrective action but will minimize post audit disagreements and discussions.

As part of the biennial review of the QA program, an independent audit is being planned for later this year. The audit is intended to review the corrective action progress in response to the December 1982 audit including those actions formulated in 1983 with regard to modification testing and turnover activities. Also included will be the traditional review of the audit program with emphasis on the Quality Assurance Audit Organization as well as a broader examination of the overall effectiveness of the Quality Assurance program.

Very truly yours,


Roger W. Kober

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



LYNN I. HAUCK

NOTARY PUBLIC, State of N.Y., Monroe County
My Commission Expires March 30, 1986

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