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June 28, 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 84-04  
R.E. Ginna Nuclear Power Plant, Unit No. 1  
Docket 50-244

Dear Dr. Murley:

This is in response to Special Inspection Report No. 50-244/84-04 based upon the March 20-22 inspection conducted by Mr. J.R. White of your office and subsequent telephone discussions between Mr. White and members of the Ginna Staff.

As a result of a previous review (NRC Inspection Report 50-244/83-23) of the Post Accident Sampling System (PASS) by NRC Region I personnel, it became apparent that there were weaknesses in RG&E's start-up testing and turnover programs. An in-depth review of the overall program was initiated by Management, resulting in a Modification Process Improvement Plan as described in our letter of January 27, 1984 (J.E. Maier to T.E. Murley). This modified program was in the process of being implemented for the PASS at the time of the March 20 inspection and presently addresses the six items of concern in Inspection Report No. 50-244/84-04.

Item 1

The start-up test procedure SM-2606.5G provided inadequate acceptance criteria for determining system functional operability.

Response 1

Test procedure SM-2606.5G has been superseded by a controlling master procedure SM-2606.6 and subjugated procedures SM-2606.6A through SM-2606.6M excepting SM-2606.6I. The subjugated procedures address each specific function of the system as well as integrated performance of the system. For each procedure, data sheets include the acceptance criteria by which the test results are judged to determine functional acceptability. These criteria are also included in the Test Plan.

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#### Item 2

The documentation of tests performed relative to SM-2606.5G was confused and without form. Many of the test results were recorded on undated scraps of paper, in notes on the margins of some copies of the procedure, on separate unattached sheets of paper on the data sheets provided in the procedure.

#### Response 2

Several checks and balances have been instituted into the start-up and turnover program to prevent the reoccurrence of this concern. Presently, when a system is to undergo start-up testing, the Lead Test Supervisor prepares a Test Plan. The Test Plan lists all tests that are necessary to be performed to demonstrate the acceptable operability of the system. The Test Plan also provides general resource requirements and schedule information. The test procedures detail the type of test, the acceptance criteria, and other relevant information. Test procedures are submitted to the Plant Operating Review Committee (PORC) for review, prior to conducting the test. The Test is performed by (or under the direction of) the Lead Test Supervisor, who is responsible for ensuring that procedure data sheets are filled out and that all relevant test results are documented in accordance with the criteria of the data sheets. The responsible QC Inspector for the test reviews the data for completeness and accuracy, then documents that the test results are valid. Following the review by the Lead Test Engineer and QC, the completed test procedure is submitted to the Responsible Engineer, who reviews the data for acceptability and completeness. PORC performs the final review prior to the acceptance of the system.

#### Item 3

In certain of the analysis parameters, such as pH and dissolved gas concentration, laboratory verification of the standards used to perform the test and calibration was not provided.

#### Response 3

In the SM-2606.6 series of tests, data sheets are designed such that laboratory verification of parameters is required before a test can be considered complete.

#### Item 4

Though performance test results through July 15, 1983, were never completely satisfactory, the project quality assurance group never generated any adverse surveillance finding or non-conformance report.

#### Response 4

The SM-2606.6 series of test procedures requires QC verification of tests results. Where test results have been unsatisfactory, surveillance reports have been written and/or the QC Inspector signifies in the procedure, the failure to meet predetermined test criteria.

#### Item 5

Functional verification of the systems capability to perform dilution of reactor coolant, an essential feature for the determination of radioactivity, was never verified as acceptable when the system was declared operable by the Plant Operations Review Committee on July 15, 1983.

#### Response 5

In J.E. Maier's letter to you dated November 4, 1983, it was indicated that, although the basis for determination of operability of the PASS could not be readily documented and that the documentation was less than desirable, a detailed review showed that the system did satisfy our regulatory commitment. However, included in the SM-2606.6 series of procedures are two procedures, SM-2606.6F and SM-2606.6K that further demonstrate that the Ginna PASS can meet NUREG 0737 dilution requirements. SM-2606.6F utilizes a Mg tracer. Test results are within 15% deviation by laboratory analysis. SM-2606.6K utilizes tritium as a tracer and is within a factor of 2 by laboratory analysis.

#### Item 6

The licensee has not yet performed any performance test to validate that the PASS has the capability to provide for representative samples.

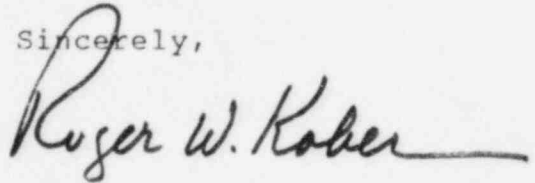
#### Response 6

During the March 20 inspection, it became clear to RG&E personnel that a major concern of the NRC was demonstrating that the PASS had capability to provide representative samples when compared to existing sample points. The SM-2606.6 series of procedures was further expanded to include a demonstration of this capability. SM-2606.6J was written to demonstrate that the PASS could provide a representative containment air sample based on noble gases after several days of operation at power. Laboratory analyses of samples taken at the PASS compared within 20% of samples taken at the normal plant sample point. SM-2606.6L was written to demonstrate that the PASS could provide a representative sample of the reactor coolant when compared to a sample taken in the nuclear sample room. This test was scheduled after seven effective full power days following the 1984 refueling; however, plant start-up difficulties and failure of a regulating valve in the PASS have delayed this test.

The completion of the SM-2606.6 series of tests will conclude the test program for the PASS. At present, eleven of the twelve tests have been completed. Ten have been completed with satisfactory results, but SM-2606.6K, liquid dilution utilizing tritium, is being considered for retest since it is felt that test results can be improved. SM-2606.6D, liquid degas verification, test results are being evaluated and may need to be performed again. SM-2606.6L, "B" loop sample verification, has yet to be performed.

At this time, it is expected that all testing will be completed by the end of July, and test documentation completed, reviewed and approved by the end of August.

Sincerely,

A handwritten signature in cursive script that reads "Roger W. Kober". The signature is written in dark ink and has a fluid, connected style.

Roger W. Kober

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