April 19, 2000

Dr. Robert C. Mecredy
Vice President, Ginna Nuclear Operations
Rochester Gas and Electric Corporation
89 East Avenue
Rochester, New York 14649

SUBJECT: NRC INTEGRATED INSPECTION REPORT 05000244/2000-001

Dear Dr. Mecredy:

On April 1, 2000, the NRC completed an inspection at your R. E. Ginna nuclear power plant. The enclosed report presents the results of that inspection. Preliminary results and conclusions were presented to RG&E management, led by Mr. J. Widay of your staff, in an exit meeting on April 12.

During the ten weeks covered by this inspection, your conduct of activities at the Ginna facility was generally characterized by safety-conscious operations, sound engineering and maintenance practices, and careful radiological work controls. Operator performance during three events that required a reduction in plant power level was good.

Based on the results of our review, the NRC has determined that a Severity Level IV violation of NRC requirements occurred. This violation is being treated as a Non-Cited Violation (NCV), consistent with Section VII.B.1.a of the enforcement policy. The NCV is described in the subject inspection report and involves the conduct of a maintenance activity, affecting the quality of plant equipment, without appropriate procedural instructions. If you contest the violation or the severity level of the NCV, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555-0001, with copies to the Regional Administrator, Region 1; the Director, Office of Enforcement; and the NRC Resident Inspector at the Ginna station.

We appreciate your cooperation. In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be made available to the public.

Sincerely,

/RA/

Michele G. Evans, Chief
Projects Branch 1
Division of Reactor Projects

Docket No.: 05000244

License No: DPR-18

Enclosure: Inspection Report 05000244/2000-001

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U.S. NUCLEAR REGULATORY COMMISSION
REGION I

License No.	DPR-18
Report No.	05000244/2000-001
Docket No.	05000244
Licensee:	Rochester Gas and Electric Corporation (RG&E)
Facility Name:	R. E. Ginna Nuclear Power Plant
Location:	1503 Lake Road Ontario, New York 14519
Inspection Period:	January 24, 2000 through April 1, 2000
Inspectors:	H. K. Nieh, Senior Resident Inspector C. R. Welch, Resident Inspector F. L. Bower, Resident Inspector, Calvert Cliffs T. L. Hoeg, Resident Inspector, Calvert Cliffs T. A. Moslak, Radiation Specialist, Division of Reactor Safety P. R. Frechette, Security Specialist, Division of Reactor Safety K. A. Young, Reactor Engineer, Division of Reactor Safety
Approved by:	M. G. Evans, Chief Projects Branch 1 Division of Reactor Projects

EXECUTIVE SUMMARY

R. E. Ginna Nuclear Power Plant
NRC Integrated Inspection Report 05000244/2000-001

This integrated inspection included aspects of licensee operations, engineering, maintenance, and plant support. The report covers a 10-week period of resident inspection, and it includes the results of announced inspections by regional specialists in the radiation protection and security areas.

Operations

During three unplanned power changes, control room operators followed appropriate procedures and promptly performed required actions. (Section O1.2)

RG&E effectively tracked control room deficiencies and appropriately prioritized their repairs. None of the deficiencies significantly affected the control room operators' ability to safely operate and monitor the power plant. (Section O2.1)

Maintenance

A number of examples of poor work planning were noted. A Non-Cited Violation was identified involving a work activity, with an inadequate technical evaluation, that compromised the operability of a safety related battery charger. Additionally, numerous administrative errors were noted in the reviewed work packages. Although minor in nature, the errors indicate a need for improvement in attention to detail, during work planning and execution. (Section M4.1)

Engineering

Ineffective periodic flushing of service water system supply piping to the auxiliary feedwater system caused excessive silt accumulation in low flow areas. RG&E's evaluation and corrective actions for this issue were acceptable. (Section E2.1)

Engineering technical evaluations for degraded conditions were acceptable. RG&E plans to resolve some minor deficiencies were appropriate. (Section E2.2)

Plant Support

Radiological controls were adequately implemented as indicated by a trained and experienced staff implementing detailed procedures to minimize external and internal exposure. Access to radiologically controlled areas was properly controlled, personnel dose was properly monitored, and instruments were properly calibrated. (Section R1)

RG&E adequately monitored the implementation of the radiation protection program, worker practices, and procedural compliance through various management controls, including audits, departmental self-assessments, and routine management observations. Appropriate actions were taken to evaluate and correct deficiencies that affected performance. (Section R7)

Executive Summary (cont'd)

RG&E's security program was properly implemented and met regulatory requirements. (Sections S1 through S7)

The material condition of the observed fire protection equipment was good. Detection and suppression systems were properly aligned and tested. RG&E maintained effective control of combustible materials and housekeeping. (Section F2.1)

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ATTACHMENTS

Report Details

Summary of Plant Status

Ginna began the period at full power. On two occasions during the week of February 7, operators reduced power to approximately 45% due to frazil ice conditions in Lake Ontario. On March 14, operators again reduced power from 100% to about 30% due to a steam leak in the turbine building. Following repairs, the unit was returned to full power on March 15 and remained there through the end of the inspection period.

I. Operations

O1 Conduct of Operations

O1.1 General Comments (71707)

The inspectors conducted frequent observations of ongoing plant operations, including control room walkdowns, log reviews, shift turnovers, and plant tours with equipment operators. In general, the conduct of operations was professional and safety-conscious. Equipment operator tours were thorough and communications with the control room were formal and complete.

O1.2 Unplanned Power Changes

a. Inspection Scope (71707, 40500)

The inspectors observed control room operator performance during three unplanned power changes. Two (February 8 and 12) resulted from frazil ice conditions in Lake Ontario, which impacted the plant's circulating water supply, and one (March 14) resulted from a steam leak in the turbine building. The inspectors also observed plant operations review committee (PORC) activities associated with the events.

b. Observations, Findings, and Conclusions

In each event, control room operators followed appropriate procedures and promptly performed required actions to reduce plant power level. Control room communications were generally good, and distractions during the events were minimized. Operators used peer checking and three-way communication techniques. During the steam leak, RG&E used appropriate measures to limit personnel access around the leak area and protect nearby electrical switchgear. The PORC thoroughly evaluated each event and recommended appropriate corrective actions. Engineering and maintenance departments also provided good support.

02 Operational Status of Facilities and Equipment

O2.1 Review of Control Room Deficiencies

a. Inspection Scope (71707, 40500)

The inspectors evaluated the types and effects of control room deficiencies tracked by RG&E, which included items such as inaccurate indications, spurious alarms, and minor equipment problems.

b. Observations and Findings

At the time of inspection, approximately 60 control room deficiencies existed, mostly affecting non-safety related systems. The inspectors did not identify any deficiency that significantly impaired the operators' ability to assess plant conditions. RG&E conspicuously identified the deficiencies, and those that required additional operator actions were evaluated in the operator workaround/challenge program. The inspectors discussed the deficiencies with on-shift operators, and found them to be well aware of the deficiencies and their associated effects. RG&E had prioritized the planning and repair of the noted deficiencies based on their significance.

c. Conclusions

RG&E effectively tracked control room deficiencies and appropriately prioritized their repairs. None of the deficiencies significantly affected the control room operators' ability to safely operate and monitor the power plant.

O7 Quality Assurance in Operations

O7.1 Problem Identification/Resolution and Self Assessment Activities

a. Inspection Scope (40500, 71707)

The inspectors observed a number of plant operations review committee (PORC) meetings, action report (AR) screening meetings, and reviewed an operations department self assessment.

b. Observations, Findings, and Conclusions

RG&E personnel exhibited a questioning and probing demeanor during the PORC and AR screening meetings. The PORC approved conservative and well thought out action plans for troubleshooting a safety injection accumulator level instrument problem and locating a potential source of steam generator contaminants from the auxiliary feedwater system. The operations department self assessment appeared critical with reasonable recommended actions.

II. Maintenance

M1 Conduct of Maintenance

M1.1 General Comments

Throughout the inspection period, the inspectors watched all or portions of numerous risk significant maintenance and surveillance activities. RG&E personnel effectively performed the activities in accordance with approved procedures and station requirements.

M4 Maintenance Staff Knowledge and Performance

M4.1 Work Planning and Execution

a. Inspection Scope (62707)

The inspection consisted of: 1) review of several risk significant work packages that were planned and ready to be worked; 2) field observations of selected packages; 3) routine work planning meeting observations; and 4) review of several closed out work packages.

b. Observations and Findings

Generally, the inspectors found that the prepared work packages and planning meetings were consistent with the administrative work control procedures (A-1603 series procedures). However, many administrative errors were noted in the work packages examined. Although these errors were of minor consequence, they collectively indicate a need to improve attention to detail during work planning, execution, and closeout review. The inspectors questioned the adequacy of the technical reviews required for troubleshooting work packages. Specifically, the inspectors did not feel that the current review method, a cursory checklist, provided a sufficient level of evaluation. Related to this concern, the inspectors identified a problem that resulted from an inadequate technical review during the planning process.

On February 28, the inspectors noted that a non-safety related data recorder was connected to the operable 1A battery charger without adequate electrical isolation. This configuration compromised the charger's safety related class 1E design. RG&E installed the recorder on February 16 for monitoring voltage and current in the "A" 125 volt DC distribution system. This activity was controlled using procedure A-59, "Use of Installed Test Points," which permits the installation of temporary test equipment. However, A-59 does not provide guidance for assessing the potential impacts on the affected systems. The inspectors considered this use of procedure A-59 to be inappropriate, since RG&E should have evaluated system operability with the battery charger in a temporary configuration.

RG&E removed the data recorder and generated an action report (2000-0305) to address the issue. Initially, the action report description narrowly focused on the inadequacies associated with A-59. As a result, the corrective action process did not assess the impact on plant equipment and did not evaluate past operability of the DC distribution system with the test equipment installed. RG&E personnel agreed with the inspectors' observations, revised the action report, and performed a past operability evaluation, which identified a potential failure mechanism that could render the 1A battery charger inoperable. However, RG&E determined that the "A" 125 volt DC distribution system could perform its safety functions since: 1) protection devices (i.e., circuit breakers) existed in the class 1E distribution system to isolate the faulted charger, and 2) the redundant 1A1 battery charger remained operable. Nonetheless, the inspectors concluded that an inadequate technical review during the work planning process resulted in the use of an inappropriate procedure (A-59) for a safety related activity. This severity level IV violation of 10 CFR 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," is being treated as a Non-Cited Violation, consistent with Section VII.B.1.a of the NRC Enforcement Policy **(NCV 05000244/2000-001-01)**. This violation is in the licensee's corrective action program.

The inspectors also noted two examples where work planning deficiencies delayed the restoration of safety related components to an operable status. First, a work package (No. 19901964) for repairs of a standby auxiliary feedwater (AFW) system valve did not provide adequate instructions for packing gland torque requirements. The valve packing leaked during post-maintenance testing. RG&E prepared an emergent work package to re-torque the gland. As a result, the standby AFW system was inoperable for an additional nine hours to complete maintenance and testing. Second, mechanical maintenance technicians determined that an emergent work package (No. 19903860) for repairing an AFW system service water valve could not be performed as written due to conflicts with referenced procedures. This delayed the operability testing of the system by about five hours.

c. Conclusions

A number of examples of poor work planning were noted. One work activity, with an inadequate technical evaluation, compromised the operability of a safety related battery charger. Additionally, numerous administrative errors were noted in the reviewed work packages. Although minor in nature, the errors indicate a need for improvement in attention to detail, during work planning and execution.

III. Engineering

E2 Engineering Support of Facilities and Equipment

E2.1 Service Water System Silt Accumulation

a. Inspection Scope (37551, 40500)

The inspectors assessed RG&E's actions following the identification of silt buildup in the service water (SW) supply piping to the auxiliary feedwater (AFW) system.

b. Observations and Findings

SW provides an alternate water supply to the AFW pumps during certain unlikely external events (e.g., earthquakes) that render the normal AFW supply (condensate storage tanks) inoperable. A small amount of flow is continuously maintained through the SW supply lines for AFW pump bearing and lube oil cooling. Through radiographic testing in February, RG&E identified silt accumulation in the horizontal lengths of SW piping leading to the motor driven and turbine driven (MDAFW and TDAFW) pump suctions.

The MDAFW supply had excessive silt buildup, filling about half the piping's cross-sectional area through most of the examined length. The TDAFW supply piping also had some silt accumulation, filling about one quarter of the piping's cross-sectional area in a small portion of the examined length. No significant silt accumulation was found in the SAFW supply piping. RG&E initiated an action report (2000-0267) to document and evaluate these conditions. Subsequent extended high velocity flushes were successful in removing the silt accumulation in the MDAFW supply, but not in the TDAFW supply.

Engineering department personnel performed a technical evaluation of the issue and concluded that the silt buildup in the MDAFW and TDAFW supply lines did not adversely affect the ability of the AFW system to deliver sufficient flow from the SW system. The evaluation contained conservative calculations showing that adequate net positive suction head was available for the MDAFW and TDAFW pumps, with the silt buildup present. Additionally, the evaluation determined that no potential for clogging of system components existed due to the very fine consistency of the silt. The inspectors judged RG&E's operability assessment to be reasonable.

The inspectors referenced Ginna's SW system reliability optimization program manual. This program requires periodic flushes on sections of the system that are susceptible to silt buildup. RG&E personnel were performing short duration flushes during quarterly AFW pump testing. The inspectors concluded that these flushes were ineffective in preventing excessive silt accumulation. RG&E also reached this conclusion and adequately addressed flushing methodology in their root cause analysis and corrective actions, which include more frequent radiographic exams and the performance of higher velocity flushing.

c. Conclusion

Ineffective periodic flushing of service water system supply piping to the auxiliary feedwater system caused excessive silt accumulation in low flow areas. RG&E's evaluation and corrective actions for this issue were acceptable.

E2.2 Engineering Technical Evaluations

a. Inspection Scope (40500, 37551)

The inspectors reviewed open action reports (ARs) to assess the adequacy of the engineering technical evaluations associated with the degraded conditions of safety systems. Procedure IP-CAP-1, "Abnormal Condition Tracking Initiation or Notification (Action) Report," was used as a reference.

b. Observations and Findings

The inspectors identified that the technical evaluations for the ARs selected were acceptable in scope and level of technical detail. Some minor evaluation and administrative deficiencies of no safety consequence were identified and promptly addressed by the Ginna staff. These minor deficiencies were not subject to formal enforcement action. The inspectors observed that RG&E had an acceptable threshold for identifying deficiencies and evaluating degraded conditions. The inspectors also noted that the collective impact of the identified degraded safety systems did not represent a significant decrease in overall plant safety. Furthermore, RG&E had established appropriate plans and schedules for resolving these problems.

c. Conclusions

Engineering technical evaluations for degraded conditions were acceptable. RG&E plans to resolve some minor deficiencies were appropriate.

E8 Miscellaneous Engineering Issues

E8.1 (Closed) Inspector Follow-Up Item 05000244/1998-007-02: Evaluation of RG&E's 10 CFR 50.54(f) review project. This item was created because of an issue involving design basis management (NRC IR 05000244/1998-007 and 1999-007). The inspectors discussed the progress of RG&E's design basis review project with cognizant engineering department personnel, and concluded that RG&E's current progress and completion schedule were acceptable. This item is closed.

IV. Plant Support

R1 Radiological Protection and Chemistry (RP&C) Controls

a. Inspection Scope (83750)

The inspector evaluated ALARA (as low as reasonably achievable) program implementation, relative to planning and controlling work. Inspection consisted of plant tours, procedure reviews, work observations, and interviews with plant personnel.

b. Observations and Findings

For 1999, RG&E established a cumulative dose goal of 160 person-rem for activities conducted during power operations (goal of 20 person-rem) and the spring refueling outage (goal of 140 person-rem). The year's actual cumulative exposure was about 174.5 person-rem, which included 152 person-rem accrued during the outage and 22.5 person-rem resulting from power operation activities. Goals were exceeded due, in part, to complications during the outage in which a filtration system failed during baffle bolt cutting in the reactor vessel. The resulting spread of contamination increased dose rates in the reactor cavity and the containment. Numerous job-specific ALARA goals were challenged by these abnormal conditions and the associated emergent work.

Radiation work permits (RWP) were complete with current survey data referenced, appropriate dosimetry designated, conservative electronic dosimetry setpoints established, and protective clothing requirements stated. Interviewed technicians were knowledgeable of RWP requirements and current radiological and plant conditions.

Personnel working in radiologically controlled areas properly wore dosimetry. Whole body counting was appropriately performed to assess internal exposure. Dosimetry records were current and complete. Dose to declared pregnant workers was conservatively controlled and closely monitored.

Observed workers complied with RWP requirements and used prudent measures to minimize dose while performing instrument calibrations and obtaining/analyzing a reactor coolant sample.

In the auxiliary building, air sampling equipment was properly maintained and appropriately located in areas of potential airborne contamination. Daily source checks of survey instruments were performed and issuance of instruments was adequately controlled.

RG&E maintained high housekeeping standards in radiologically controlled areas and conscientiously implemented boundary controls to limit the spread of contamination.

Through record review and interviews with selected technicians, the inspector determined that training requirements were met and that the individuals were qualified to perform their assigned tasks.

c. Conclusion

Radiological controls were adequately implemented as indicated by a trained and experienced staff implementing detailed procedures to minimize external and internal exposure. Access to radiologically controlled areas was properly controlled, personnel dose was properly monitored, and instruments were properly calibrated.

R7 Quality Assurance in Radiological Protection and Chemistry Activities

a. Inspection Scope (83750)

The inspector reviewed a quality assurance (QA) audit, radiation protection department self-assessments, management observation results, and relevant action reports to determine the adequacy of problem identification and resolution.

b. Observations and Findings

Radiation protection audit report No. AINT-1999-0008-JMT was a comprehensive assessment of the procedures and processes in the radiation protection program. Areas evaluated included instrument calibration, dosimetry, radiation worker practices, area postings, and effectiveness of the corrective action program.

Departmental self-assessments adequately addressed lessons learned during the past refueling outage and efforts to reduce site contaminated areas. Departmental supervision closely monitored corrective action status.

Management observations of in-progress jobs were routinely conducted. The quality of pre-job briefs, field activity performance, and personnel turnovers were systematically evaluated using checklists as guides. Action reports were appropriately initiated for observed deficiencies.

The inspector verified that corrective actions from previous unintended personnel exposures during reactor cavity cleaning (reference IR 05000244/1999-004) were either implemented or scheduled for implementation prior to the next refueling outage.

c. Conclusions

RG&E adequately monitored the implementation of the radiation protection program, worker practices, and procedural compliance through various management controls, including audits, departmental self-assessments, and routine management observations. Appropriate actions were taken to evaluate and correct deficiencies that affected performance.

S1 Conduct of Security and Safeguards Activities

a. Inspection Scope (81700)

The inspector examined alarm stations, communications, and protected area (PA) access control of personnel, packages, and vehicles.

b. Observations and Findings

Alarm stations. The inspector verified that the alarm stations were equipped with appropriate alarms, surveillance and communications capabilities. Interviews with the alarm station operators found them knowledgeable of their duties and responsibilities. The inspector verified, through observations and interviews, that the alarm stations were continuously manned. The stations were independent and diverse so that no single act could remove the plants capability for detecting a threat and calling for assistance. The alarm stations did not contain any operational activities that could interfere with the execution of detection, assessment, and response functions.

Communications. Document reviews and discussions with alarm station operators demonstrated that the alarm station personnel were capable of maintaining continuous communications with each security force member on duty, and were exercising communication methods with the local law enforcement agencies as committed to in the Security Plan.

PA access control of personnel, vehicles, and hand-carried packages and material. Personnel and package search activities were observed at the personnel access portal. Positive controls were in place to ensure only authorized individuals were granted access to the PA, and that all personnel and hand carried items entering the PA were properly searched. Observation of a vehicle search was conducted. The search was thorough and met all Security Plan requirements. The vehicle was properly controlled and its entry was properly documented.

c. Conclusions

Security and safeguards activities with respect to alarm station controls, communications, and protected area access control of personnel, packages, and vehicles were effectively implemented and met RG&E commitments and NRC requirements.

S2 Status of Security Facilities and Equipment

a. Inspection Scope (81700)

The inspector reviewed PA assessment aids, PA detection aids, personnel search equipment and testing, maintenance, and compensatory measures.

b. Observations and Findings

PA assessment aids. The effectiveness of assessment aids was evaluated by observing a walkdown of the entire PA perimeter on closed circuit television. The assessment aids had generally good picture quality and zone overlap. To ensure that Security Plan commitments were satisfied, RG&E had procedures in place requiring the implementation of compensatory measures in the event the alarm station operators were unable to properly assess the cause of an alarm.

PA detection aids. Multiple observations of a security force member conducting performance testing of the perimeter intrusion detection system were conducted. The testing consisted of multiple intrusion attempts in every zone. The appropriate alarms were generated in each attempt. The equipment was functional and effective and met the requirements of the Security Plan.

Personnel and package search equipment. Routine use and performance testing of personnel and package search equipment were observed. Observations and procedural reviews indicated that the search equipment performed in accordance with RG&E procedures and Security Plan commitments.

c. Conclusions

RG&E's security facilities and equipment were determined to meet commitments and NRC requirements.

S3 Security and Safeguards Procedures and Documentation

a. Inspection Scope (81700)

The inspector examined implementing procedures and security event logs.

b. Observations and Findings

Security program procedures. The inspector reviewed selected implementing procedures associated with PA access control; testing and maintenance of personnel search equipment; and performance testing of PA detection aids. The procedures were consistent with Security Plan commitments, and were properly implemented.

Security event logs. Security event logs for the previous twelve months were reviewed. Based on this review and discussion with security management, the inspector determined that RG&E appropriately analyzed, resolved, and documented safeguards events that were determined not reportable to the NRC within one hour.

c. Conclusions

Security and safeguards procedures and documentation requirements were properly implemented. Event logs were properly maintained and effectively used to analyze, track, and resolve safeguards events.

S4 Security and Safeguards Staff Knowledge and Performance

a. Inspection Scope (81700)

The inspector assessed security staff requisite knowledge

b. Observations and Findings

The inspector interviewed and observed a number of security force members (SFM) performing their routine duties. These observations included alarm station operations; personnel, vehicle, and package searches; and testing of the perimeter intrusion detection system. The inspector determined that the SFMs were knowledgeable of their responsibilities and duties, and could effectively carry out their assignments.

c. Conclusions

Security force members adequately demonstrated the requisite knowledge necessary to effectively implement the duties and responsibilities associated with their position.

S5 Security and Safeguards Staff Training and Qualification

a. Inspection Scope (81700)

The inspector examined SFM training and qualifications (T&Q), and training records.

b. Observations and Findings

Security training and qualifications. Eight randomly selected T&Q records of SFMs were reviewed. Physical and qualification records were inspected for armed and supervisory personnel. The results of the review indicated that the security force was being trained in accordance with the approved T&Q plan. In addition, an observation of classroom training of new officers was conducted. The instructor was knowledgeable, and the material was presented in a professional manner. The students were encouraged to actively participate in the class.

Training records. Records were properly maintained and accurate, and reflected the current qualifications of the SFMs.

c. Conclusions

Security force personnel were being trained in accordance with the requirements of the training and qualification plan. Training documentation was properly maintained and accurate, and the training provided was effective.

S6 Security Organization and Administration

a. Inspection Scope (81700)

The inspector reviewed management support and staffing levels.

b. Observations and Findings

Management support. Review of program implementation since the last program inspection disclosed that adequate support and resources continued to be available to ensure proper program implementation.

Staffing Levels. The total number of trained security force members immediately available on shift met the minimum requirements specified in the Security Plan. No performance issues were noted in the areas inspected.

c. Conclusions

The level of management support was adequate to ensure proper implementation of the security program, and was evidenced by the allocation of resources to support programmatic needs.

S7 Quality Assurance in Security and Safeguards Activities

a. Inspection Scope (81700)

The inspector reviewed audits, problem analyses, corrective actions, and effectiveness of management controls.

b. Observations and Findings

Audits. A review of both the annual physical security and the access authorization program audits was conducted. The audits were thorough and in-depth. The audit teams included technical specialists from other utilities. None of the audit findings were indicative of programmatic issues.

Problem analyses. A review of data from the security department's self-assessment program was accomplished. Potential weaknesses were being properly identified, tracked, and trended.

Corrective actions. A review of the corrective actions implemented by RG&E in response to the 1999 quality assurance (QA) audit and self-assessment program indicated that the actions were technically sound and were performed in a timely manner.

Effectiveness of management controls. RG&E had programs in place for identifying and resolving problems. They included the performance of annual QA audits, a departmental self-assessment program, and the use of industry data such as violations of regulatory requirements identified by the NRC at other facilities, as a criterion for self-assessment.

c. Conclusions

The audit program was properly administered. The self-assessment program was effectively implemented to identify and resolve potential weakness.

S8 Miscellaneous Security and Safeguards Issues

S8.1 (Closed) Inspector Follow-Up Item 05000244/1999-201-01: Safeguards Event. During the operational safeguards response evaluation, conducted the week of June 21, 1999, an open item associated with a potential vulnerability was identified. A review was conducted of RG&E's corrective actions associated with this item. The inspectors determined that RG&E implemented appropriate corrective actions to address this issue. No violation of NRC requirements was identified. This item is closed.

F2 Status of Fire Protection Facilities and Equipment

F2.1 Fire Detection and Suppression System Walkdowns

a. Inspection Scope (71750)

The inspectors performed a walkdown of selected fire detection and suppression systems at Ginna, and reviewed associated fire protection documentation.

b. Observations and Findings

In the intermediate building cable tunnel, which RG&E identified as risk significant, the inspectors found that fire detectors were in good physical condition and clear of debris. The suppression system was also in good condition with no damaged or obstructed sprinkler heads. The suppression system had sufficient pressure and was aligned for operation per the applicable diagrams. A selected comparison of installed detection and suppression system components to their associated installation drawings found no discrepancies. RG&E had adequately conducted surveillance tests on the pre-action wet pipe system and the smoke detection system to verify operability.

The inspectors found that fire protection equipment material condition was good and that combustible fire loading was properly maintained. Fire suppression system pressure was adequate. Selected fire hoses did not exhibit any cracks or fraying and

had properly rated nozzles. Gauges for various suppression equipment, including fire extinguishers and Halon tanks, indicated in the appropriate ranges. Fire doors were latched properly and no conditions were noted where access to suppression equipment was restricted by materials or machinery. Emergency lights properly illuminated when tested by RG&E personnel, and the illumination patterns were reasonable.

A centrally located service building fire brigade response room, instituted in December 1999, was well equipped; contained a sprinkler system; was bordered by three-hour fire barrier walls; and contained appropriate Appendix R emergency lighting for access/egress of the area. Fire brigade members' full turnout gear and fire fighting equipment was found in good condition and organized in an acceptable manner. RG&E instituted procedure SC-3.15.15, "Emergency Fire Equipment Inventory and Inspection," to perform the necessary testing on the fire brigade response room equipment. The procedure also inventoried hose cabinets, the site support emergency vehicle, control building emergency air packs, Appendix R lockers, foam fire fighting units, communications equipment, and alternate cooling equipment.

The inspectors questioned the lack of surveillance tags on station fire extinguishers. RG&E stated that procedure SC-3.15.3, "Portable Extinguisher Inspection," placed into effect December 28, 1999, no longer required the use of the tags. The inspectors verified that a sample of fire extinguishers were current with the new monthly surveillance requirements. Additionally, the inspectors selected a sample of fire protection components and verified that required surveillance tests had been conducted.

c. Conclusion

The material condition of the observed fire protection equipment was good. Detection and suppression systems were properly aligned and tested. RG&E maintained effective control of combustible materials and housekeeping.

V. Management Meetings

X1 Exit Meeting Summary

After the inspection was concluded, the inspectors presented the results to members of licensee management on April 12, 2000. The licensee acknowledged the findings presented.

The inspectors asked the licensee whether any materials examined during the inspection should be considered proprietary. No proprietary information was identified.

ATTACHMENT I

PARTIAL LIST OF PERSONS CONTACTED

Licensee

J. Widay	VP, Plant Manager
G. Combs	Radiation Protection Technician
S. Eckert	Access Authorization Administrator
R. Gaspar	Lead Technician, Radiochemistry
K. Gould	Health Physicist
G. Graus	I&C/Electrical Maintenance Manager
G. Hermes	Acting Primary Systems Engineering Manager
J. Hotchkiss	Mechanical Maintenance Manager
D. Jones	Instrument Calibration Technician
G. Joss	Results and Test Supervisor
N. Leoni	Quality Assessment Coordinator
C. Meighan	ALARA Coordinator
F. Mis	Principal Health Physicist
J. Pacher	Electrical Systems Engineering Manager
D. Palmer	Security Training Supervisor
E. Palmer	Security Operations Coordinator
R. Ploof	Secondary Systems Engineering Manager
R. Popp	Production Superintendent
R. Puddu	Radiation Protection Technician
J. Smith	Maintenance Superintendent
W. Thomson	Chemistry & Radiological Protection Manager
T. White	Operations Manager
B. Woods	Instrument Calibration Technician
G. Wrobel	Nuclear Safety & Licensing Manager

INSPECTION PROCEDURES USED

IP 37551:	Onsite Engineering
IP 40500:	Effectiveness of Licensee Controls in Identifying, Resolving, and Preventing Problems
IP 61726:	Surveillance Observation
IP 62707:	Maintenance Observation
IP 71707:	Plant Operations
IP 71750:	Plant Support

ITEMS OPENED, CLOSED, AND DISCUSSED

Opened/Closed

NCV	05000244/2000-001-01	Failure to use appropriate procedures during DC distribution troubleshooting.

Closed

IFI	05000244/1998-007-02	Evaluation of RG&E's 10 CFR 50.54(f) review project.
IFI	05000244/1999-201-01	Safeguards Event.

LIST OF ACRONYMS USED

AFW	Auxiliary Feedwater
ALARA	As Low As Reasonably Achievable
AR	Action Report
CFR	Code of Federal Regulations
DC	Direct Current
IFI	Inspector Follow-Up Item
IR	Inspection Report
MDAFW	Motor Driven Auxiliary Feedwater
NCV	Non-Cited Violation
NRC	Nuclear Regulatory Commission
NRR	Nuclear Reactor Regulation
PA	Protected Area
PORC	Plant Operations Review Committee
QA	Quality Assurance
RG&E	Rochester Gas and Electric Corporation
RP&C	Radiological Protection and Chemistry
RWP	Radiation Work Permit
SAFW	Standby Auxiliary Feedwater
SFM	Security Force Member
SW	Service Water
T&Q	Training and Qualification
TDAFW	Turbine Driven Auxiliary Feedwater
TE	Technical Evaluation