UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
475 ALLENDALE ROAD
KING OF PRUSSIA, PA 19406-1415

July 20, 2010

Mr. John T. Carlin, Vice President
R.E. Ginna Nuclear Power Plant, LLC
Constellation Energy Nuclear Group, LLC
1503 Lake Road
Ontario, New York 14519

SUBJECT: R.E. GINNA NUCLEAR POWER PLANT - NRC INTEGRATED INSPECTION REPORT 05000244/2010003

Dear Mr. Carlin:

On June 30, 2010, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at your R.E. Ginna Nuclear Power Plant. The enclosed integrated inspection report documents the inspection results, which were discussed on July 15, 2010, with you and other members of your staff.

The inspection examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel.

Based on the results of this inspection, no findings of significance were identified.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response (if any) will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of the NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at http://www.nrc.gov/reading-rm/adams.html (the Public Electronic Reading Room).

Sincerely,

Glenn T. Dentel

Glenn T. Dentel, Chief
Projects Branch 1
Division of Reactor Projects

Docket No. 50-244
License No. DPR-18

Enclosure: Inspection Report No. 05000244/2010003
w/Attachment: Supplemental Information

cc w/encl: Distribution via ListServ

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U.S. NUCLEAR REGULATORY COMMISSION

REGION I

Docket No.:	50-244
License No.:	DPR-18
Report No.:	05000244/2010003
Licensee:	Constellation Energy Nuclear Group, LLC
Facility:	R.E. Ginna Nuclear Power Plant, LLC
Location:	Ontario, New York
Dates:	April 1, 2010 through June 30, 2010
Inspectors:	K. Kolaczyk, Senior Resident Inspector L. Casey, Resident Inspector N. Perry, Senior Project Engineer R. Rolph, Health Physicist
Approved by:	Glenn T. Dentel, Chief Projects Branch 1 Division of Reactor Projects

Enclosure

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SUMMARY OF FINDINGS

IR 05000244/2010003; 04/01/2010 – 06/30/2010; R.E. Ginna Nuclear Power Plant, LLC (Ginna), Routine Integrated Inspection Report.

The report covered a 3-month period of inspection by resident inspectors and region-based inspectors. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 4, dated December 2006.

No findings of significance were identified.

REPORTS DETAILS

Summary of Plant Status

R.E. Ginna Nuclear Power Plant (Ginna) began the inspection period operating at full rated thermal power and operated at full power for the entire period.

1. REACTOR SAFETY

Cornerstones: Initiating Events, Mitigating Systems, and Barrier Integrity

1R01 Adverse Weather Protection (71111.01 – Two samples)

.1 Hot Weather Preparations

a. Inspection Scope

During the week of May 24, 2010, the inspectors reviewed Ginna's preparations for hot weather, and performed walkdowns of plant areas. To perform the review, the inspectors used the criteria and design criterion outlined in Ginna procedure O-23, "Hot Weather Seasonal Readiness Walkdown," Revision 00600, and the updated final safety analysis report (UFSAR), Revision 22. As part of the walkdown, local area temperatures were checked, as well as the operability of ventilation and air conditioning (A/C) cooling systems to ensure that the plant was prepared to handle warm weather conditions. Areas of focus consisted of the 'A' and 'B' emergency diesel generator (EDG) rooms, the main feed pump room, the standby auxiliary feedwater (AFW) pump room, and the screen house.

b. Findings

No findings of significance were identified.

.2 Grid Stability

a. Inspection Scope

Using the criteria in Ginna procedures O-6.9, "Ginna Station Operating Limits for Station 13A Transmission," Revision 03202, and O-6, "Operations and Process Monitoring," Revision 10500, the inspectors evaluated the readiness of offsite and onsite alternating current power systems. The inspectors verified that communication protocols between the transmission system operator and the plant were specified in Ginna's procedures to ensure appropriate information was being exchanged. The inspectors verified that the procedures addressed measures to monitor and maintain the availability and reliability of these systems during adverse weather conditions.

b. Findings

No findings of significance were identified.

1R04 Equipment Alignment (71111.04)

Partial System Walkdown (71111.04Q – Four samples)

a. Inspection Scope

The inspectors reviewed the alignment of system valves and electrical breakers to ensure proper inservice or standby configurations as described in plant procedures, piping and instrument drawings (P&IDs), and the UFSAR. During the walkdown, the inspectors evaluated the material condition and general housekeeping of the system and adjacent spaces. The inspectors also verified that operators were following plant technical specifications (TSs) and system operating procedures. The inspectors performed a partial walkdown of the following systems:

- Electrical plant lineup for the 'B' EDG when the 'A' EDG was out of service (OOS) for planned surveillance and maintenance activities;
- The 'A' train of the component cooling water (CCW) system following completion of maintenance activities on the 'A' CCW heat exchanger (HX);
- The service water (SW) system while the 'C' SW pump was OOS for planned maintenance; and
- The 'A' train of the residual heat removal (RHR) system while the 'B' RHR train was OOS for planned maintenance.

b. Findings

No findings of significance were identified.

1R05 Fire Protection (71111.05Q – Five samples)

a. Inspection Scope

The inspectors performed walkdowns of fire areas to determine if there was adequate control of transient combustibles and ignition sources. The material condition of fire protection systems, equipment and features, and the material condition of fire barriers were inspected against Ginna's licensing basis and industry standards. In addition, the passive fire protection features were inspected including the ventilation system fire dampers, structural steel fire proofing, and electrical penetration seals. The following plant areas were inspected:

- EDG 'B' (Fire Area EDG-1B);
- Cable Spreading Room (Fire Area CT);
- Standby AFW Room (Fire Area SAF);

- Technical Support Center (Fire Zone TSC-1S); and
- Charging Pump Room (Fire Area CHG).

b. Findings

No findings of significance were identified.

1R07 Heat Sink Performance (71111.07 – Two samples)

a. Inspection Scope

The inspectors reviewed performance tests, periodic cleaning, eddy current inspections, chemical control methods, tube leak monitoring, tube plugging condition, operation procedures, and maintenance practices for a sample of safety-related HXs. The inspectors examined and verified that the controls for the selected components conformed to Ginna's commitments to Generic Letter (GL) 89-13, "SW System Problems Affecting Safety-Related Equipment." The following safety-related HXs were inspected:

- 'A' CCW HX; and
- 'B' CCW HX.

b. Findings

No findings of significance were identified.

1R11 Licensed Operator Requalification Program (71111.11Q – One sample)

a. Inspection Scope

On April 23, 2010, the inspectors observed licensed operator simulator training scenario, SEG-10-03-03, "Minimum Shift Crew Manning," Revision 0. The scenario involved a loss of instrument air event occurring while the control room was at the TS-required minimal staff level. Prior to the simulator scenario, the inspectors reviewed the expected actions outlined in the lesson plan and verified they were consistent with Ginna's procedures and operator guidelines. During the scenario, the inspectors observed the operators' performance and observed the post-evaluation critique. The inspectors also reviewed and verified compliance with Ginna procedure OTG-2.2, "Simulator Examination Instructions," Revision 43.

b. Findings

No findings of significance were identified.

1R12 Maintenance Effectiveness (71111.12Q – Two samples)

a. Inspection Scope

The inspectors evaluated work practices and follow-up corrective actions for selected systems, structures, and components (SSCs) for maintenance effectiveness. The inspectors reviewed the performance history of those SSCs and assessed extent-of-condition determinations for those issues with potential common cause or generic implications to evaluate the adequacy of corrective actions. The inspectors reviewed Ginna's problem identification and resolution actions for these issues to evaluate whether Ginna had appropriately monitored, evaluated, and dispositioned the issues in accordance with procedures and the requirements of 10 CFR Part 50.65, "Requirements for Monitoring the Effectiveness of Maintenance." In addition, the inspectors reviewed selected SSC classifications, performance criteria and goals, and corrective actions that were taken or planned to verify whether the actions were reasonable and appropriate.

The following issues were reviewed:

- Ginna's 10 CFR 50.65(a)(3), "Periodic Maintenance Effectiveness Assessment," dated April 22, 2010; and
- Equipment deficiencies associated with the control room radiation and toxic gas monitors.

b. Findings

No findings of significance were identified.

1R13 Maintenance Risk Assessments and Emergent Work Control (71111.13 – Four samples)

a. Inspection Scope

The inspectors evaluated the effectiveness of Ginna's maintenance risk assessments required by 10 CFR Part 50.65(a)(4). The inspectors discussed the use of Ginna's online risk monitoring software with control room operators and scheduling department personnel. The inspectors reviewed equipment tracking documentation and daily work schedules, and performed plant tours to verify that actual plant configuration matched the assessed configuration. Additionally, the inspectors verified that risk management actions, for both planned and emergent work, were consistent with those described in CNG-OP-4.01-1000, "Integrated Risk Management," Revision 00600.

Risk assessments for the following OOS SSCs were reviewed:

- The turbine-driven auxiliary feedwater (TDAFW) pump while Rochester Gas & Electric (RG&E) was performing work in station 13A (April 5, 2010);

- Testing of the 'D' standby AFW train while the 'B' CCW HX was OOS for planned maintenance, and RG&E was performing work in station 13A (April 27, 2010);
- Testing of the technical support center (TSC) diesel generator (May 3, 2010); and
- Planned maintenance on fire system S14, which is the TDAFW pump fire protection system (May 20, 2010).

b. Findings

No findings of significance were identified.

1R15 Operability Evaluations (71111.15 – Four samples)

a. Inspection Scope

The inspectors reviewed operability evaluations and/or condition reports (CRs) in order to verify that the identified conditions did not adversely affect safety system operability or plant safety. The evaluations were reviewed using criteria specified in NRC Regulatory Issue Summary 2005-20, "Revision to Guidance formerly contained in NRC GL 91-18, Information to Licensees Regarding Two NRC Inspection Manual Sections on Resolution of Degraded and Nonconforming Conditions and on Operability" and Inspection Manual Part 9900, "Operability Determinations and Functionality Assessments for Resolution of Degraded or Nonconforming Conditions Adverse to Quality or Safety." In addition, where a component was inoperable, the inspectors verified the TS limiting condition for operation implications were properly addressed.

The inspectors performed field walkdowns, interviewed personnel, and reviewed the following items:

- CR 2010-2254, TSC Total Airflow Reduced Due to Inadequacies in PT-37.9LU;
- CR 2010-1739, Questionable Anchorages in SW Flow Indicator in Intermediate Building;
- CR 2010-1477, Relief Valve 283 Lifting; and
- CR 2010-2170, Main Control Board Annunciator E-8, Control Room Heating, Ventilation, and A/C Trouble Alarm Locked In.

b. Findings

No findings of significance were identified.

1R18 Plant Modifications (71111.18 – One sample)

Temporary Modification

a. Inspection Scope

The inspectors reviewed engineering change package (ECP) 10-000319, "Control Room Emergency Air Treatment System (CREATS) Data Acquisition Recorder Temporary Connection." The inspectors reviewed the ECP to determine whether the temporary

modification adversely affected system availability or a function important to plant safety. The inspectors reviewed the associated system design basis including the UFSAR and TSs, and assessed the adequacy of the safety determination screening and evaluation. The inspectors also assessed the configuration of the temporary change by reviewing selected drawings and procedures to verify appropriate updates had been made. The inspectors compared the temporary installation with the temporary modification documents to determine whether the implemented change was consistent with the approved, documented modification.

b. Findings

No findings of significance were identified.

1R19 Post-Maintenance Testing (71111.19 – Six samples)

a. Inspection Scope

The inspectors observed portions of post-maintenance testing (PMT) activities in the field to determine whether the tests were performed in accordance with approved procedures. The inspectors assessed each test's adequacy by comparing the test methodology to the scope of maintenance performed. In addition, the inspectors evaluated the test acceptance criteria to verify that the tested components satisfied the applicable design and licensing bases and TS requirements. The inspectors reviewed the recorded test data to determine whether the acceptance criteria were satisfied.

The following PMT activities were reviewed:

- STP-O-3QB, "Containment Spray (CS) Pump 'B' Quarterly Test," Rev. 00001, to test the 'B' CS pump following maintenance performed under work orders (WOs) C90656909, "Motor EQ Lubrication," C90656832, "Minor Pump Preventive Maintenance Inspection," and C90656942, "CS Seal HX Ultrasonic Testing and Maintenance," (April 6, 2010);
- CPI-TRIP-TEST-5.10, "Reactor Protection System (RPS) Trip Test/Calibration for Channel 1 (Red) Bistable Alarms," Rev. 03400, to test RPS channel 1 following maintenance performed under WO C90663814, "Perform Quarterly Surveillance Tests for RPS Bistable Channel 1," (April 12, 2010);
- WO C90681144, "Weekly Electrical Equipment Inspection/Minor Maintenance," Rev. 30, to test equipment following completion of repetitive task P201574, weekly electrical equipment inspection (May 21, 2010);
- STP-O-23.1, "Local Leak Rate Test of Penetration 120B," Rev. 101, to test air-operated valve (AOV) 539 following maintenance under WO C20900368, "Replace Diaphragm and Solenoid For AOV-539," (June 6, 2010);
- Work instructions for WO C90893853, "Main Condenser Sump Pump PWT19 Not Functioning," to test the main condenser sump pump following troubleshooting activities performed under WO C90887722, "Main Condenser Sump Pump Not Operating," (June 16, 2010); and
- Work Instructions for WO C90847581, "SEP-14, Security Flywheel, Uninterruptible Power Supply, Air Filter Change, and Wipe Out Flywheel Area" (June 24, 2010).

b. Findings

No findings of significance were identified.

1R22 Surveillance Testing (71111.22 – Three samples)

a. Inspection Scope

The inspectors observed the performance and/or reviewed test data for the following surveillance tests that are associated with selected risk-significant SSCs to verify that TSs were followed and that acceptance criteria were properly specified. The inspectors also verified that proper test conditions were established as specified in the procedures, no equipment preconditioning activities occurred, and acceptance criteria were met.

- S-12.4, "Reactor Coolant System (RCS) Leakage Surveillance Record Instructions," Rev. 05401 (April 15, 2010);
- CH-PRI-SAMP-ROOM, "Sampling in the Nuclear Sample Room," Rev. 01402 (April 16, 2010); and
- PT-60.13A, "CREATS Heating and Cooling System Performance Test Train 'A'," Rev. 00700 (April 24, 2010).

b. Findings

No findings of significance were identified.

2. RADIATION SAFETY

Cornerstone: Public/Occupational Radiation Safety

2RS7 Radiological Environmental Monitoring Program (71124.07)

a. Inspection Scope

From June 21 to 25, 2010, the inspectors performed the following activities to verify the radiological environmental monitoring program (REMP) quantifies the impact of the radioactive releases to the environment, sufficiently validates the integrity of the radioactive gaseous and liquid effluent release program, and to ensure the program monitors non-effluent exposure pathways, is based on sound principles and assumptions, and validates that doses to members of the public are within the dose limits of 10 CFR Part 20 and 40 CFR Part 190 as applicable.

Inspection Planning

The inspectors reviewed Ginna's annual radiological environmental operating report (AREOR) for January 1 to December 31, 2009, issued May 2010.

The inspectors reviewed the offsite dose calculation manual (ODCM) to identify locations of the environmental monitoring stations. The inspectors verified only administrative changes were made to the ODCM since the last inspection.

The inspectors reviewed the UFSAR for information regarding the environmental monitoring program and meteorological monitoring instrumentation.

The inspectors reviewed quality assurance audit results of the program and the vendor's program.

The inspectors reviewed Ginna's 2009 annual radioactive effluent release report (ARERR).

Site Inspection

The inspectors walked down eight air sample collection stations, eight thermo-luminescent dosimeter stations, and two water composite stations to determine if they were located as described in the ODCM and to determine the material condition of the equipment.

The inspectors reviewed the calibration records of the air samplers and the water composite samplers.

The inspectors verified that Ginna had alternate sampling locations for vegetation if the primary locations have no plants.

The inspectors observed the collection and preparation of more than four environmental samples from different environmental media. The inspectors verified the sampling was representative of the release pathways as specified in the ODCM and the sampling techniques were in accordance with the procedures.

The inspectors verified the meteorological instruments were operable, calibrated, and maintained.

The inspectors verified that missed and or anomalous environmental samples were identified and reported in the annual environmental monitoring report. The inspectors verified for at least three missed samples that the events were captured in Ginna's corrective action program (CAP) and corrective actions implemented as appropriate.

The inspectors verified that Ginna had implemented a sampling and monitoring program sufficient to detect leakage to ground water from the retention tank, the all volatiles treatment building, the spent fuel pool (SFP), and the retention pond.

The inspectors verified that records of leaks, spills, and remediation were retained in a retrievable manner.

The inspectors verified that no significant changes have been made to the ODCM since the previous inspection.

The inspectors verified that appropriate detection sensitivities were used for counting samples.

The inspectors reviewed the results of the inter-laboratory comparison program to verify the adequacy of environmental sample analyses performed by Ginna's vendor.

Problem Identification and Resolution

The inspectors verified that problems associated with the REMP were being identified by Ginna at an appropriate threshold and were properly addressed for resolution in Ginna's CAP.

b. Findings

No findings of significance were identified.

4. OTHER ACTIVITIES

4OA1 Performance Indicator Verification (71151)

.1 Cornerstone: Barrier Integrity

a. Inspection Scope (71151 – Two samples)

The inspectors reviewed Ginna's operations logs and chemistry surveillance records to verify the accuracy of data reported under the RCS leak rate and the RCS-specific activity Performance Indicators (PIs). The inspectors used the guidance provided in Nuclear Energy Institute (NEI) 99-02, "Regulatory Assessment PI Guideline," Revision 6, to assess the accuracy of Ginna's collection and reporting of the PI data.

The inspectors observed a sample of S-12.4, "RCS Leakage Surveillance Record Instructions," Revision 05401, which determined RCS leakage rates submitted under this PI. The PI data reviewed for RCS leak rate encompassed the period from April 2009 through March 2010.

The inspectors also observed chemistry sampling and analysis surveillance activities which determined the RCS-specific activity reported under this PI. The PI data reviewed for the RCS-specific activity encompassed the period from March 2009 through March 2010.

b. Findings

No findings of significance were identified.

.2 Cornerstone: Mitigating Systems

a. Inspection Scope (71151 – One sample)

Using the criteria specified in NEI 99-02, Revision 6, the inspectors verified the completeness and accuracy of the PI data for safety system functional failures. To verify the accuracy of the data, the inspectors reviewed control room logs, CRs, NRC inspection reports, and Ginna event reports issued from April 2009 through April 2010.

b. Findings

No findings of significance were identified.

4OA2 Identification and Resolution of Problems

.1 Semi-Annual Review (71152 – One sample)

a. Inspection Scope

In order to identify trends that might indicate the existence of a more significant safety issue, the inspectors reviewed CRs initiated from December 2009 to May 2010, though some examples expanded beyond those dates when the scope of the trend warranted. The review focused on repetitive equipment and corrective maintenance issues but also considered the results of daily inspector corrective action screenings. Additionally, the inspectors reviewed corrective action trends reports (fourth quarter 2009 and first quarter 2010), quality assurance assessment reports, a system health report (first quarter 2010), the maintenance rule status report, and the 2009 and 2010 top 10 material conditions lists. The inspectors also discussed trends and potential trends with appropriate personnel.

b. Findings and Observations

No findings of significance were identified. No trends were noted that indicated a potential safety significant issue. Although several trends or potential trends were identified by the inspectors, plant personnel were aware of these and had initiated corrective actions as necessary.

.2 Continuous Review of Items Entered into the Corrective Action Program

a. Inspection Scope

As specified by Inspection Procedure 71152, "Identification and Resolution of Problems," and in order to help identify repetitive equipment failures or specific human performance issues for follow-up, the inspectors performed a daily screening of items entered into Ginna's CAP. This review was accomplished by reviewing electronic copies of CRs, periodic attendance at daily screening meetings, and accessing Ginna's computerized database.

b. Findings

No findings of significance were identified.

.3 Operator Workarounds (71152 – One sample)

a. Inspection Scope

The inspectors reviewed the operator workaround program described in procedure A-52.16, "Operator Workaround/Challenge Control," Revision 02300. The purpose of the review was to verify procedure A-52.16 was properly implemented by Ginna personnel, and the program had adequate guidance to ensure workaround problems were identified at an appropriate threshold and entered into the CAP. To perform this review, the inspectors performed a control room walkdown and discussed equipment deficiencies with control room operators to determine if deficiencies were appropriately identified and that their impact on operations was assessed. The inspectors also toured selected areas of the plant. Operator workarounds or maintenance issues that affected a mitigating system's function or the operator's ability to implement abnormal and emergency operating procedures were reviewed more closely. As part of this review, the inspectors reviewed several periodic reports completed since October 2009 that track the status of potential operator workarounds, challenges, and degraded operability items.

b. Findings and Observations

No findings of significance were identified. Quarterly, representatives from Ginna's operations department review the status of plant equipment, and assess if the aggregate effects of off normal conditions in the plant can adversely impact the ability of operators to respond to events. The results are documented in an internal self-assessment report. To perform the review, several equipment OOS lists were consulted, including the plant health committee (PHC) issues list. While reviewing the completed self-assessment reports for the fourth quarter 2009 and the first quarter 2010, the inspectors noted that some of the lists that Ginna's operations department used to develop the self-assessment reports were outdated, and did not reflect the current status of plant equipment. For example, the PHC issues list that was used to develop the quarterly report identified conditions that had been repaired during the September 2009 outage. Another data input, the temporary modifications log, did not include all current temporary modifications. Although the inspectors did not identify any instances where the use of incorrect data changed the overall conclusions reached in the self assessments reports, using outdated or incorrect reference material as input to a self-assessment report did not meet Ginna management standards.

4OA3 Follow-up of Events and Notices of Enforcement Discretion (71153 – One sample)

.1 Entry into ER-SC.4, Earthquake Emergency Plan

a. Inspection Scope

On June 23, 2010, at 1:50 p.m., control room operators entered ER-SC.4, "Earthquake Emergency Plan," Revision 1200, when they were notified by plant personnel that unexplained ground tremors had occurred. No ground motion was detected by the plant earthquake accelerograph located in the intermediate building subbasement area. An inspection of the plant by plant maintenance and operations personnel revealed no visible damage had occurred and the station exited ER-SC.4 at 4:14 p.m. The ground tremors were caused by an earthquake that occurred in an area north of Ottawa, Canada, that registered 5.0 on the Richter scale. The inspectors toured portions of the plant following the event and confirmed the ground tremors did not have an adverse effect on the plant. Further, the inspectors confirmed that the intensity of the earthquake was below the detection level for the installed plant seismic monitoring equipment.

b. Findings

No findings of significance were identified.

4OA5 Other Activities

Inspection Results for Temporary Instruction (TI) 2515/173, Review of the Implementation of the Industry Ground Water Protection Voluntary Initiative

a. Inspection Scope

From June 21 to 25, 2010, the inspectors performed the following activities to confirm Ginna's implementation of the industry ground water protection initiative (GPI) as described in NEI 07-07, "Industry Ground Water Protection Initiative." The inspection was performed in accordance with TI 2515/173.

GPI Objective 1.1 – Site Hydrology and Geology

The inspectors verified that in 1996 a hydrology and geologic study was performed by an outside contractor to determine the predominant ground water flow characteristics and gradients.

The inspectors reviewed whether a review of the study by a knowledgeable utility employee has been documented.

The inspectors verified that potential pathways have been identified for ground water migration from on-site locations to off-site locations through ground water.

The inspectors reviewed whether a frequency had been established in Ginna procedures for periodic review of the hydro geologic studies.

The inspectors verified that no changes were required to the UFSAR.

GPI Objective 1.2 – Site Risk Assessment

The inspectors verified that Ginna has identified SSCs that involved or could reasonably be expected to involve licensed material and for which there is a credible mechanism for licensed material to reach ground water.

The inspectors verified that Ginna had identified leak detection methods for each of the SSCs that involved or could reasonably be expected to involve licensed material and for which there is a credible mechanism for licensed material to reach ground water.

The inspectors reviewed whether potential enhancements to the leak detection systems or programs have been identified.

The inspectors reviewed whether potential enhancements have been identified to prevent leaks and spills from reaching ground water.

The inspectors verified that Ginna's CAP will be used to identify and track corrective actions.

The inspectors verified a long-term program had been established to perform preventative maintenance or surveillance activities to minimize the potential for inadvertent releases of licensed materials due to equipment failure. The inspectors reviewed the leakage from the spent fuel pool and verified the leaks have been identified using a new leakage detection method using vacuum boxes. The inspectors also verified repair of the leaks was scheduled after the 2011 refueling outage. The inspectors verified the current SPF leakage is being contained, and the liquid is processed via the normal plant clean-up system.

The inspectors verified that a 5-year frequency has been established in Ginna procedures for periodic review of SSCs but not for work practices.

GPI Objective 1.3 – On-Site Ground Water Monitoring

The inspectors verified Ginna had considered the placement of monitoring wells down gradient from the plant but within the site boundary.

The inspectors verified that Ginna considered placing sentinel wells closer to SSCs that have the highest potential for inadvertent releases that could reach ground water.

The inspectors verified that Ginna has established sampling and analysis protocols, including analytical sensitivity in site procedures.

The inspectors verified that a formal written program had been established for long-term

ground water monitoring. The inspectors reviewed whether the ODCM has been revised to include ground water monitoring as the monitoring locations are not included in the REMP.

The inspectors verified that the analytical capabilities were periodically reviewed as part of the analytical cross check program.

The inspectors reviewed whether a long-term program had been established in Ginna procedures for the maintenance of the ground water monitoring wells.

The inspectors reviewed whether a frequency had been established in Ginna procedures for the periodic review of the ground water monitoring program.

GPI Objective 1.4 – Remediation Process

The inspectors verified that written procedures have been established outlining the decision-making process for the remediation of leaks and spills or other instances of inadvertent releases.

The inspectors verified that an evaluation was performed of the potential for detectible levels of licensed material from planned releases of liquids and/or airborne materials.

The inspectors verified that an evaluation had been performed and documented on the decommissioning impacts resulting from remediation activities.

GPI Objective 1.5 – Recordkeeping

The inspectors verified that a recordkeeping program had been established to meet the requirements of 10 CFR 50.75 (g).

GPI Objective 2.1 – Stakeholder Briefings

The inspectors verified by discussion with Ginna staff that initial briefings on the site-specific GPI program have been performed with designated State and Local officials.

The inspectors verified Ginna had considered including additional information or updates on ground water protection in the annual reports for State and Local officials.

The inspectors verified that Ginna has coordinated communication efforts with other nuclear power plants in New York.

GPI Objective 2.2 – Voluntary Communications

The inspectors verified that Ginna procedures establish communication protocols for communicating leaks and spills to State and Local officials.

The inspectors verified that the ODCM established communication protocols for ground or surface water samples exceeding REMP reporting criteria.

GPI Objective 2.3 – 30-Day Reports

The inspectors verified that ground water samples were analyzed and compared to the standards and limits contained in the ODCM.

The inspectors verified that no 30-day special reports for ground water monitoring have been submitted to the NRC.

GPI Objective 2.4 – Annual Reporting

The inspectors verified that appropriate changes have been made to Ginna procedures to support the 2006 implementation.

The inspectors verified that all ground water sample results were included in the AREOR and the ARERR.

The inspectors verified that no ground water samples taken as part of the GPI were part of the REMP program.

The inspectors verified that events that required communication to the State or Local officials were completed in accordance with the GPI.

The inspectors verified that no water sample results have exceeded REMP reporting thresholds since the implementation of the GPI.

GPI Objective 3.1 – Perform a Self Assessment of the GPI Program

The inspectors verified that an independent knowledgeable individual performed the initial self assessment of the ground water program prior to the implementation of the GPI and that another self assessment was performed in 2009.

The inspectors verified that self assessments are required every 5 years per CA 2010-1450.

The inspectors verified that the self assessment, SA-2009-0188, included an evaluation of all of the GPI objectives.

The inspectors verified the self assessments were documented in accordance with Ginna procedures.

GPI Objective 3.2 – Review the Program under the Auspices of NEI

The inspectors verified an independent, knowledgeable individual performed an initial review after the initial assessment but not within 1 year of implementation.

The inspectors verified that Ginna required a periodic review of the GPI program every 5 years per CA 2010-1450.

b. Findings

No findings of significance were identified. Implementation of the industry GPI is voluntary. Under the initiative, each site was to have developed an effective, technically sound ground water program by August 2008. The inspector identified that, at the time of this inspection, Ginna had not taken action on all ground water initiative objectives (as outlined in the Temporary Instruction) as follows:

- GPI Objective 1.1 – Site Hydrology and Geology. The inspectors determined that a hydrology and geologic study has not been performed since 1996 even though new structures have been built on site. The inspectors determined that a review of the study by a knowledgeable utility employee has not been documented. The inspectors also determined that a frequency had not been established in Ginna procedures for periodic review of the hydro geologic studies.

- GPI Objective 1.2 – Site Risk Assessment. The inspectors determined that Ginna had identified leak detection methods for each of the SSCs that involved or could reasonably be expected to involve licensed material and for which there is a credible mechanism for licensed material to reach ground water but has not identified them for work practices. The inspectors determined that potential enhancements to the leak detection systems or programs have not been identified. The inspectors also determined that potential enhancements have not been identified to prevent leaks and spills from reaching ground water.

- GPI Objective 1.3 – On-Site Ground water Monitoring. The inspectors determined that the ODCM has not been revised to include ground water monitoring as the monitoring locations are not included in the REMP. The inspectors determined that a long-term program had not been established in Ginna procedures for the maintenance of the ground water monitoring wells. The inspectors also determined that a frequency had not been established in Ginna procedures for the periodic review of the ground water monitoring program.

These issues were entered into the corrective action program as CAs 2010-1438, 2010-1439, 2010-1440, 2010-1441 and 2010-1444.

4OA6 Meetings, Including Exit

Exit Meeting Summary

On July 15, 2010, the resident inspectors presented the inspection results to Mr. John Carlin and other members of his staff, who acknowledged the findings. The inspectors verified that none of the material examined during the inspection is considered proprietary in nature.

ATTACHMENT: SUPPLEMENTAL INFORMATION

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee Personnel

J. Carlin	Vice President, Ginna
J. Bowers	Acting General Supervisor, Radiation Protection
T. Hedges	Emergency Preparedness Manager
E. Larson	Plant Manager
K. McLaughlin	Assistant Operations Manager (Shift)
T. Paglia	Scheduling Manager
S. Snowden	Chemistry Supervisor
J. Sullivan	Manager of Operations
P. Swift	Manager, Nuclear Engineering Services

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

None.

LIST OF DOCUMENTS REVIEWED

Section 1R01: Adverse Weather Protection

Document
UFSAR, Rev. 22

Procedures
ER-SC.2, High Water (Flood) Plan, Rev. 00702
O-6, Operations and Process Monitoring, Rev. 10500
O-6.9, Ginna Station Operating Limits for Station 13A Transmission, Rev. 03202
O-23, Hot Weather Seasonal Readiness Walkdown, Rev. 00600

Section 1R04: Equipment Alignment

Documents
P201574, Weekly Electrical Equipment Inspection
UFSAR, Rev. 22

Drawings
33013-1245, Auxiliary Coolant CCW P&ID, Sheet 1 of 1, Rev. 32
33013-1245, Auxiliary Coolant CCW P&ID, Sheet 2 of 2, Rev. 12
33013-1247, Auxiliary Coolant RHR, Rev. 44

Condition Report
2010-3618

Work Order
C60681144

Section 1R05: Fire Protection

Documents
Fire Damper Manual, Rev. 6
ND-FPP, Fire Protection Program, Rev. 01400

Procedures
FPS-1, Fire Barrier Control Procedure, Rev. 9
FPS-2.3, Temporary Fire Barrier Penetration Seals Program, Rev. 00700
M-56.1, Establishment of Temporary Fire Seals, Rev. 02900
SC-3.15.3, Portable Extinguisher Inspection, Rev. 23

Condition Reports
2010-2295
2010-2307
2010-2309

Section 1R07: Heat Sink Performance

Document
SW System Reliability Optimization Program, Rev. 10

Condition Reports
2010-2820
2010-3055

Work Orders
90638724
90681240
20807251

Section 1R11: Licensed Operator Requalification Program

Document
SEG-10-03-03, Minimum Shift Crew Manning, Rev. 0

Procedure
OTG-2.2, Simulator Examination Instructions, Rev. 43

Section 1R12: Maintenance Effectiveness

Documents
Maintenance Rule (a)(3), Periodic Maintenance Effectiveness Assessment, April 22, 2010
System Health Report for the Radiation Monitoring System for 2nd Quarter 2010

Condition Reports

2007-3579	2008-2428	2008-6953	2009-3875
2007-6031	2008-2681	2008-6995	2009-4292
2007-6239	2008-2873	2008-7849	2009-4829
2007-6623	2008-6117	2008-10315	2009-5100
2007-7116	2008-6428	2009-1504	2009-6084
2007-7603	2008-6581	2009-1566	2009-8561
2007-7673	2008-6765	2009-3827	2010-0971
2007-8923	2008-6929	2009-3862	

Section 1R13: Maintenance Risk Assessments and Emergent Work Control

Documents
Auto Log Entries for All Logs on April 27, 2010
Auto Log Entries for Equipment Log on April 27, 2010

Procedure
CNG-OP-4.01-1000, Integrated Risk Management, Rev. 00600

Condition Report
2010-2294

Work Order
C90624200

Section 1R15: Operability Evaluations

Documents
UFSAR, Rev. 22

Procedures
CNG-CA-1.01-1005, Apparent Cause Evaluation, Rev. 00200
IP-EPP-10, Control of Emergency Response Facilities and Equipment, Rev. 00000

Drawings
33013-1265, Auxiliary Building Chemical Volume Control System (CVCS) Charging P&ID, Sheet 1 of 2, Rev. 011
33013-1265, Auxiliary Building CVCS Charging P&ID, Sheet 2 of 2, Rev. 022

Condition Reports

2010-2254	2010-1477
2010-1739	2010-2969
2010-2046	2010-2170

2010-1848
2010-1984
2007-0115
2009-7030

Section 1R18: Plant Modifications

Document
ECP-10-000319, CREATS Data Acquisition Recorder Temporary Connection

Drawing
21946-0825, CREATS Cooling Unit 'A' Control Schematic, Rev. 2

Work Order
C90832593

Section 1R19: Post-Maintenance Testing

Documents
P201574, Weekly Electrical Equipment Inspection
Caterpillar Operations and Maintenance Manual, Rev. 0000 (June 2001)

Procedures
CPI-TRIP-TEST-5.10, RPS Trip Test/Calibration for Channel 1 (Red) Bistable Alarms, Rev. 03400
STP-O-3QB, CS Pump 'B' Quarterly Test, Rev. 00001
STP-O-23.1, Local Leak Rate Test of Penetration 120B, Rev. 101

Drawing
33013-1261, CS, Rev. 37

Condition Reports
2010-2277
2010-2278

Work Orders
C90656909
C90656832
C90656942
C90681144
C90847581
C20900368
C90663814
C90893853
C90887722

Section 1R22: Surveillance Testing

Procedures
CH-PRI-SAMP-ROOM, Sampling in the Nuclear Sample Room, Rev. 01402
PT-60.13A, CREATS Heating and Cooling System Performance Test Train 'A', Rev. 00700
S-12.4, RCS Leakage Surveillance Record Instructions, Rev. 05401

Condition Report
2010-2678

Section 2RS7: Radiological Environmental Monitoring Program

Procedures
CH-155, Chemistry REMP Program, Rev. 00101
CH-ENV-AIR, Collection and Calculation of Beta Activity for Environmental Air Samples, Rev. 00903
CH-ENV-AIR-GAMMA, Gamma Scan of Environmental Air Samples, Rev. 3
CH-ENV-AIR-I2, Counting and Calculation of Iodine Samples, Rev. 00501
CH-ENV-MILK, Collection of Milk Samples, Rev. 00600
CH-ENV-VEG, Collection of Vegetation Samples, Rev. 00500
CH-ENV-WATER, Collection of Water Samples, Rev. 01600
CHA-ENV-QV-INTRALAB, Chemistry Radiological Environmental Quality Control, Rev. 3
CHA-ENV-REPORT, Preparing the Annual Radiological Environmental Report, Rev. 2
CNG-EV-1.01-1000, REMP, Rev. 00000

Condition Reports

2008-5706	2008-0052	2009-4769
2008-7755	2008-0304	2009-5713
2008-8200	2008-0422	2009-5887
2008-8547	2009-1053	2009-6299
2008-9583	2009-4768	2010-1784

Audits and Assessments
CHE-09-01-G, Chemistry Program, June 15, 2009
FSA-2006-79, Fleet Focused Self Assessment of H3

Calibration Records
WO C90876301, Metrological Instruments
WO C20807907, Air Sample Station ES-2
WO C20807275, Air Sample Station ES-4
WO C20807908, Air Sample Station ES-7
WO C20900253, Air Sample Station ES-10

Section 4OA1: Performance Indicator Verification

Document
NEI 99-02, NEI Regulatory Assessment PI Guideline, Rev. 6

Procedures
CH-PRI-SAMP-ROOM, Sampling in the Nuclear Sample Room, Rev. 01402
S-12.4, RCS Leakage Surveillance Record Instructions, Rev. 05401

4OA2: Identification and Resolution of Problems

Documents
2nd, 3rd, and 4th Quarters 2009 Quarterly Self Assessment of Aggregate Impact of Off Normal Conditions
1st Quarter 2010 Quarterly Self Assessment of Aggregate Impact of Off Normal Conditions

Procedure
A-52.16, Operator Workaround/Challenge Control, Rev. 02300

Condition Reports

2008-7481	2009-3267	2009-5607	2009-7326	2010-1988
2008-8685	2009-4277	2009-5678	2009-7898	2010-2573
2008-8859	2009-4999	2009-5708	2009-8001	2010-2678
2008-8900	2009-5084	2009-6461	2010-1445	
2009-3228	2009-5530	2009-7030	2010-1984	

4OA3: Followup of Events and Notices of Enforcement Discretion

Procedure
ER-SC.4, Earthquake Emergency Plan, Rev. 1200

4OA5: Other Activities

Documents
Ground Water Protection Action Plan, July 2006
NEI 07-07, Industry GPI

Procedures
CH-261, Collection and Analysis of Groundwater Samples, Rev. 00101
CH-261, Collection and Analysis of Groundwater Samples, Rev. 00200
CHA-IE8010-RESPONSE, Response to Potential Unmonitored Releases, Rev. 00001
CHA-RETS-GRNDWTR-RPT, Groundwater Notification and Reporting Requirements, Rev. 00100
CNG-AM-9.01-1000, Underground Pipe and Tank Management, Rev. 00000
IP-ENV-3, Response to a Spill of Hazardous Material or Waste, Rev. 01100

Condition Actions

2010-1438	2010-1444
2010-1439	2010-1445
2010-1440	2010-1448
2010-1441	2010-1450
2010-1443	2010-1452

Condition Reports

2008-1870	2010-1814
2008-8875	2010-1914
2009-4227	2010-2015
2009-4229	2010-2662
2009-4231	

LIST OF ACRONYMS

A/C	air conditioning
ADAMS	Agencywide Documents Access and Management System
AFW	auxiliary feedwater
AREOR	annual radiological environmental operating report
ARERR	annual radiological effluent release report
AOV	air-operated valve
CA	corrective action
CAP	corrective action program
CCW	component cooling water
CFR	Code of Federal Regulations
CR	condition report
CREATS	control room emergency air treatment system
CS	containment spray
CVCS	chemical volume control system
ECP	engineering change package
EDG	emergency diesel generator
GL	generic letter
GPI	ground water protection initiative
HX	heat exchanger
NEI	Nuclear Energy Institute
NCV	non-cited violation
NRC	U.S. Nuclear Regulatory Commission
ODCM	offsite dose calculation manual
OOS	out of service
PARS	Publicly Available Records
P&ID	piping and instrument drawing
PHC	plant health committee
PI	performance indicator
PMT	post-maintenance testing
RCS	reactor coolant system
REMP	radiological environmental monitoring program
RG&E	Rochester Gas and Electric
RHR	residual heat removal
RPS	reactor protection system
SFP	spent fuel pool
SSC	system, structure, and component
SW	service water
TDAFW	turbine-driven auxiliary feedwater
TLD	thermoluminescent dosimeter
TS	technical specification
TSC	technical support center
UFSAR	updated final safety analysis report
WO	work order

Attachment