

U.S. NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT

Region I

Report No. 50-244/78-24

Docket No. 50-244

License No. DPR-18 Priority -- Category C

Licensee: Rochester Gas and Electric Company

89 East Avenue

Rochester, New York 14649

Facility Name: R. E. Ginna Nuclear Power Plant, Unit No. 1

Inspection at: Ontario, New York; and RG&E Corporate Offices and
the Andrews Building, Rochester, New York

Inspection conducted: November 13-16, 1978

Inspectors: R.S. Markowski
R. S. Markowski, Reactor Inspector

12-5-78
date signed

G. Napuda
G. Napuda, Reactor Inspector

12/5/78
date signed

D. Kehoe
D. Kehoe, Reactor Inspector

12-5-78
date signed

Approved by: H. Kister
H. Kister, Chief, Nuclear Support Section
No. 2, RO & NS Branch

12-5-78
date signed

Inspection Summary:

Inspection on November 13-16, 1978 (Report No. 50-244/78-24)

Areas Inspected: Routine, unannounced inspection by regional based inspectors of the accepted Quality Assurance Program (QAP) implementation including: QAP changes; design change/modification control; procurement/material control; records management; and, audits. The inspection also included followup on previously identified unresolved items. The inspection involved 39 inspector-hours on site and 54.5 inspector-hours at corporate offices by three NRC regional based inspectors.

Results: Of the six areas inspected, no items of noncompliance were identified in five areas; one item of noncompliance was identified in one area (Infraction - failure to store nonduplicated recorder charts and radiographs in compliance with ANSI N45.2.9, Section 5.6, Paragraph 6.b.(1)).

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DETAILS

1. Persons Contacted

- *C. Anderson, QA Manager
- *J. Arthur, Chief Engineer
 - S. Bullock, Site QC Engineer
 - G. Daniels, Electrical Discipline Manager
 - G. Davis, Mechanical Engineer
- *K. Easterbrook, QA Engineer
 - D. Gannon, Assistant to Drafting Supervisor
- *K. Gregory, Project QC Engineer
- *L. Lang, Superintendent - Nuclear Production
 - H. Mack, Document Control Supervisor
- *R. Morse, Drafting Supervisor
 - G. Paris, I&C Supervisor
- *W. Schulze, Purchasing Buyer
- *B. Snow, Plant Superintendent
 - J. St. Martin, Project Liason Engineer
- *D. Woodward, Quality Engineering Co-ordinator
- *R. Vanderwheel, Project Manager

Other Accompanying NRC Personnel

- *J. Johnson, Reactor Inspector

*denotes those present at exit interview.

2. Followup on Previously Identified Items

(Closed) Unresolved Item (244/77-08-01): Establish correct/preferred method for making corrections to quality records. The inspector reviewed the revisions to the Quality Assurance Manual - Section 17, Procedure QE-1701GS, and Procedure QC-1701 that specify the correct/perferred method for making corrections to quality records and observed the established method to be a single line through the error, initialed, with the correction above. This item is resolved.

(Closed) Unresolved Item (244/77-08-02): Revise Procedure QE-401GS. The inspector reviewed Revision 4 to QE-401GS and observed that the revision eliminated the engineering department requirement for the QA department to initial the purchase requisition as part of engineering's review of the purchase requisition. The inspector reviewed Procedure QA-402GS and verified that the appropriate documentation of QA review of purchasing documents is specified therein. This item is resolved.



(Closed) Unresolved Item (244/77-08-03): Revise Procedure QE-1701GS. The inspector reviewed Revision 4 to QE-1701GS which contains a specific method for indexing records. The inspector reviewed the records index and storage area and found both to be consistent with the requirements of QE-1701GS, Revision 4. This item is resolved.

(Closed) Unresolved Item (244/77-17-07): Followup action associated with CAR 77-2. The inspector reviewed revised drawings transmitted for installation associated with supports SW-69, SW-70, SW-73, SW-78, and SW-83; and, audit report 77-32-CA. The drawings associated with SW-69, SW-73, SW-78, and SW-83 indicated that the support load values had been recalculated. The drawing associated with SW-70 indicated that the support had been redesigned. The RG&E audit report indicated that the AE had performed a review (by audit) and additional training in design interface control and concluded that no other design interfaces had been missed. This item is resolved.

3. Program Changes

The inspectors reviewed a sample of revisions made to the Quality Assurance Manual (QAM), and implementing procedures of the Quality Assurance Department (QA), Engineering Department (QE), Purchasing Department (QP), and the Site (QC) subsequent to the last NRC QA inspection during May 1977. These revisions were reviewed for consistency with the licensee's accepted Quality Assurance description. These procedures also served as the basis for inspection of the areas discussed in this report. During the conduct of this inspection, discussions with licensee personnel indicated that they were aware of the procedural changes.

The procedures reviewed were:

- *QAM Section 3, Design Control, Revision 7
- *QAM Section 6, Document Control, Revision 5
- QAM Section 17, Records, Revision 6
- *QA103GS, Management Review of the Quality Assurance Program, Revision 4
- QA201GS, Quality Assurance Group Organization and Responsibilities, Revision 7
- QA502GS, Preparation, Review and Approval of Quality Assurance Procedures, Revision 4



- QA601GS, Quality Assurance Review of Departmental Quality Assurance Procedures, Revision 2
- QA602GS, Preparation, Review and Approval of Procedure Deviation Requests by Quality Assurance, Revision 2
- *QA1603S, Preparation, Review and Processing of Corrective Action Reports by Quality Assurance, Revision 3
- QA1801GS, Qualification of Auditing Personnel, Revision 5
- QA1803GS, Performance of Quality Assurance Audits, Revision 3
- *QA1804GS, Reporting and Follow-up of RG&E Audit Findings, Revision 5
- *QA1806GS, Review of Audit Program, Revision 2
- *QE602GS, Control of Documents by the List of Current Revisions Method, Revision 3
- QE604GS, Distribution and Control of Documents by Project Correspondence Procedures, Revision 1
- *QE606GS, Receipt, Control and Distribution of Drawings and Aperture Cards, Revision 0
- QE1701GS, Records, Revision 4
- QP101GS, Periodic Review of Purchasing Procedures, Revision 4
- QP210GS, Purchasing Department Organization and Responsibilities, Revision 3
- *QP401GS, Preparation, Review, Approval and Issuance of Purchase Orders and Changes to Purchase Orders, Revision 4
- *QP701GS, Supplier Evaluation, Revision 5
- *QP702GS, Establishment and Maintenance of Qualified Suppliers List, Revision 5
- *QP703GS, Biennial Review of Qualified Suppliers, Revision 1
- QP1701GS, Purchasing Records, Revision 3
- *QC202, Modification Project Organization, Revision 0



- QC301, Work Start Authorization, Revision 4
- QC303, Control of System Modification Activities, Revision 3
- QC304, Control of Modification Activities by the Modification Project, Revision 0
- QC601, Quality Control Procedure Document Control, Revision 3
- QC602, Plant Procedure Document Control, Revision 12
- QC1001, Inspection and Surveillance Activities, Revision 6
- QC1102, Performance of Tests, Revision 3
- QC1501, Control and Disposition of Deficient Materials, Revision 3
- *QC1701, Quality Assurance Records, Revision 11
- QC1703, Record Storage Facility and Equipment, Revision 3

*revised since previous NRC inspection.

No items of noncompliance were identified.

4. Design Changes/Modifications

a. References

- Applicable procedures listed in paragraph 3.

b. Review

The inspector selected and reviewed the Station Modifications (SM) listed below to verify, as applicable, that they were accomplished in accordance with 10 CFR 50.59 and the licensee's accepted QA program description.

The review was conducted to verify that documentary evidence was available to establish that the following activities were performed: technical and quality verification provisions specified in engineering documents were incorporated into the modification procedures; quality verification activities (inspection and/or testing) were conducted concurrent with and/or subsequent to installation; reviews of required records were conducted and the installation was accepted prior to placing the affected system in operation; and, prints/drawings and operating procedures were revised.



The station modifications reviewed were:

- SM 75-39, Main Steam Isolation Valves
- SM 75-58, Spent Fuel Pool Cooling Discharge Pipe Rerouting
- SM 76-24, Air Ejector Radiation Monitor Modification
- SM 77-08, Full Length Control Rod Sampling Resistor Modification
- SM 77-1836, Pressure Shielding Steel Diaphragm in the Turbine Building (work in progress)

No items of noncompliance were identified. However, during this review, the inspector identified the two items discussed below.

- (1) During the review of the calibration (performed August 1977) of the rate meter drawer replaced during the performance of SM 76-24, the inspector observed that the specific test equipment utilized was not identified (e.g. by serial number).

The inspector reviewed the results of calibrations performed subsequent to the initial calibration and, calibration records associated with the test equipment utilized. These documents identified the specific test equipment used; and the acceptability of the rate meter. Based on this review of these supplementary documents, no item of noncompliance was identified.

- (2) The below listed inspection/examination records were not retrieved prior to the completion of the inspection:
 - NDE report 1520, Penetrant Test of MSIV Seat (SM 75-39)
 - NDE report 132, Ultrasonic Test of MSIV Cover Studs (SM 75-39)
 - Radiography reports for welds AC-1008-E2-E20 (SM 75-58)

Pending retrieval of these records; and, review by RI, this item is unresolved. Refer to paragraph 6.b.(2) for further details.



5. Procurement/Material Controla. Reference

-- Applicable procedures listed in paragraph 3.

b. Procurement Document Review

The Purchase Orders (PO) listed below were selected for accepted items which were stored in the station warehouse area.

The Purchase Orders were reviewed to verify that proper approvals had been obtained, quality control inspection requirements were specified, and traceability from the item to the purchase order and receipt inspection records was established. The Purchase Orders so reviewed were:

- Shock and Sway Suppressors, P.O. NEG-84686-78-2 (on hold)
- Welding Rod, P.O. NEG-87493-78-2 (rejected)
- Stationary Motor Varidisc for Charging Pumps, P.O. NEG-87493-78-10
- Shifting Motor Varidisc for Charging Pumps, P.O. NGMDWR-1748
- Fluke 343A Calibration, P.O. NEG-85751-78-1
- SS Schedule 40 Pipe, P.O. NASC-16133
- Heise Pressure Gage Calibration, P.O. NEG-85749
- 4020-B Resistor Calibration, P.O. NEG-85753
- 3450A Digital Voltmeter Calibration, P.O. NEG-85752

The inspector reviewed the inspection records documenting the receipt inspection of the selected items and confirmed that: the inspections had been conducted and reported as required; the items were procured from vendors included on the licensee's list of approved suppliers; and, the items were stored as required.

No items of noncompliance were identified, however, an unresolved record item is discussed in Paragraph 6 and two unresolved items are discussed in Paragraphs c and d below.



c. Storage Area Tour

The inspector toured the station warehouse area, observing general storage conditions, conforming and nonconforming material identification and segregation, and general house-keeping practices.

The inspector observed several unacceptable conditions at the Warehouse storage location such as accessibility, pipe protection and general cleanliness. These and other similar observed conditions were identified previously by the licensee during a routine surveillance and corrective action was initiated. The unacceptable conditions and request for corrective action are documented on PAR-78. This item is unresolved pending review of the completed requested corrective action by RI during a subsequent inspection(s). (50-244/78-24-01)

d. Inter-Divisional Services

The inspector noted that the General Maintenance Division performed quality related services under P.O. GMDWR-1748. The inspector identified a number of interface areas that were not clearly described in governing procedures such as what instructions, records, inspection documentation, etc. were required. The Maintenance Foreman provided sketches and other documents that enabled the inspector to determine that the quality affecting activities were performed and inspected as required. The inspector expressed concern about the apparent weaknesses in this area of interface control. The licensee stated that the manner of interface control with respect to services provided by the General Maintenance Division would be reviewed and appropriate action taken. Pending RI review of completed action(s) during a subsequent inspection(s) this item is unresolved. (50-244/78-24-02)

6. Records and Drawings

a. Reference

-- Applicable procedures listed in paragraph 3.

b. Record Storage and Retention

The inspector selected the following records in order to determine the licensee's capability to store, control and retrieve operating records:

-- Recorder Chart - "A" Loop Hot Leg Pressurizer Level - Control Room (June 1975)



- Recorder Chart - Pressurizer Pressure (March 1975)
- Surveillance Test PT-17.1, Radiation Monitoring System (January through December 1975)
- Flux Map Raw Data (1976)
- Daily Generation Log (May 1978)
- Surveillance Test PT-2.1, Safety Injection Pump Test (1977)
- HEPA Filter Banks DOP Test Reports (1975)
- Plant Heatups at 100°F/HR (January 1977 through July 1977) (Plant Transient Log)

The inspector reviewed the following files at the Corporate Office:

- Closed Out Car's
- Superceeded Engineering Procedures
- QA Procedures and Manual Chapters
- Design Analysis

The inspectors also requested the records listed below at various times during this inspection and verified that they were retrievable and they were maintained as required.

- Audit Reports Listed in Paragraph 7
- Procurement Records Listed in Paragraph 5
- Modification Packages and Related Records Listed in Paragraph 4

In the area of records storage and retention one item of noncompliance and two unresolved items were identified. These items are discussed below.

- (1) The inspector identified that original radiographs of safety related systems (dating to 1968) such as Reactor Coolant and Chemical Volume Control were stored within five cardboard filing boxes in the Andrews Building. The inspector also identified that operations type recorder charts, required to be retained by Technical Specifications, were stored within steel filing cabinets in a vacant warehouse office. Neither storage facility meets the



minimum physical requirements described in Paragraph 5.6 of ANSI N45.2.9 for the storage of single type records.

These two examples constitute an infraction level item of noncompliance. (50-244/78-24-03)

- (2) During the inspection, the inspectors requested the following records which were not retrieved prior to the completion of this inspection.

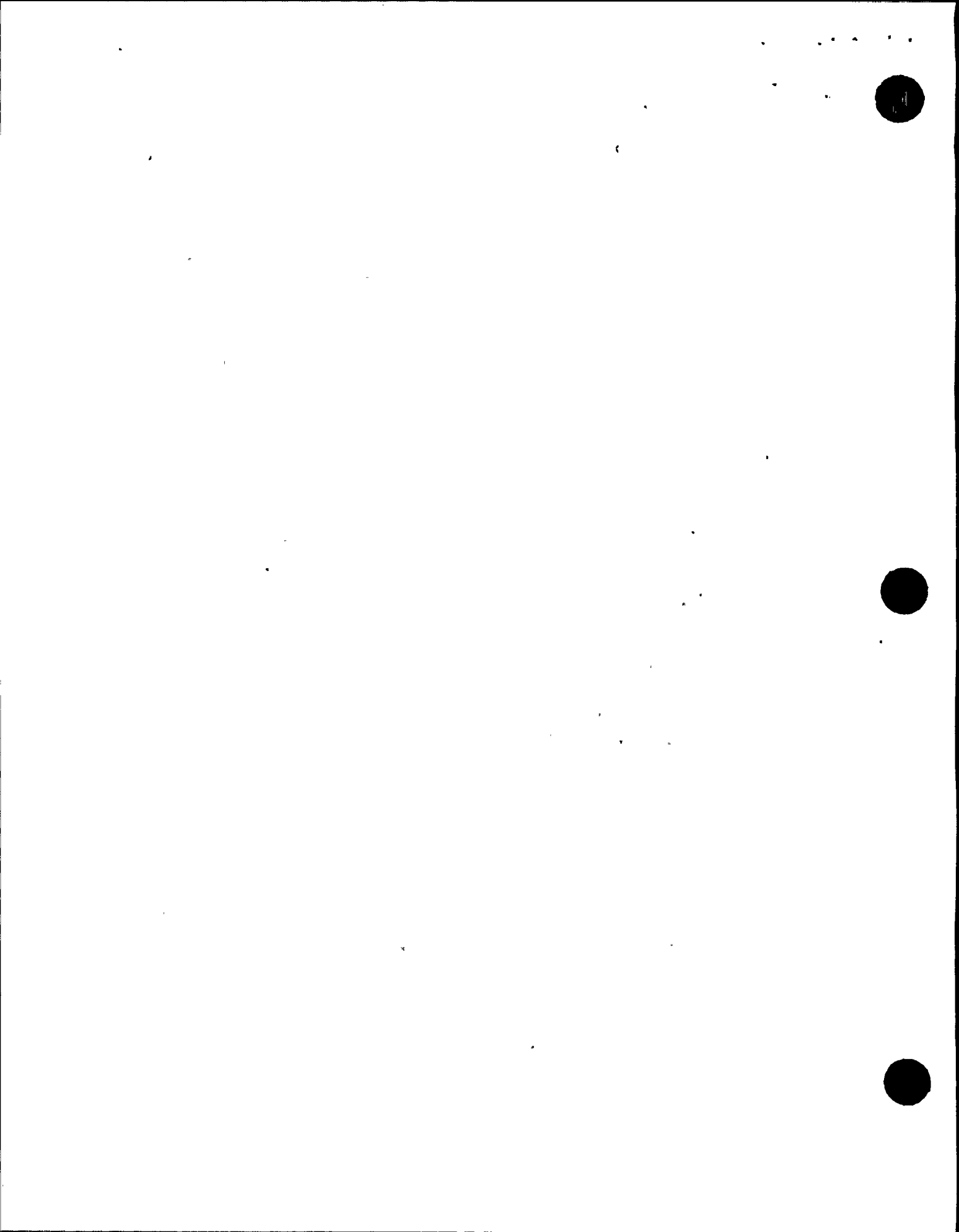
- P.O. NASC-16633 (duplicate copy, Andrews Building)
- P.O. GMDWR-1748 (duplicate copy, Andrews Building)
- NDE Report 1520 (microfilm)
- NDE Report 132 (microfilm)
- Radiographic Test Reports for Welds AC-1008-E2 through 20 - not necessarily complete numerically (microfilm)

Pending the retrieval of these records and their review by RI during a subsequent inspection(s), this item is unresolved. (50-244/78-24-04)

- (3) The microfilm of calibration data sheets associated with P.O.'s NEG-85751 and 53 were not entirely legible. The I&C Foreman had retained the original documents in the respective instruments' "History Files" and the inspector reviewed documents indicating that subject copies of the data sheets had been forwarded to the Andrews Building for duplicate storage. Therefore, duplicate storage of the required records had been accomplished.

The inspector expressed concern about the reliability of the record duplication process and verification of legibility prior to retention. The licensee stated that this area and associated activities would be reviewed and appropriate action taken to assure that microfilm of records are legible.

Until the licensee's action(s) is reviewed during a subsequent inspection(s), this item is unresolved. (50-244/78-24-05)



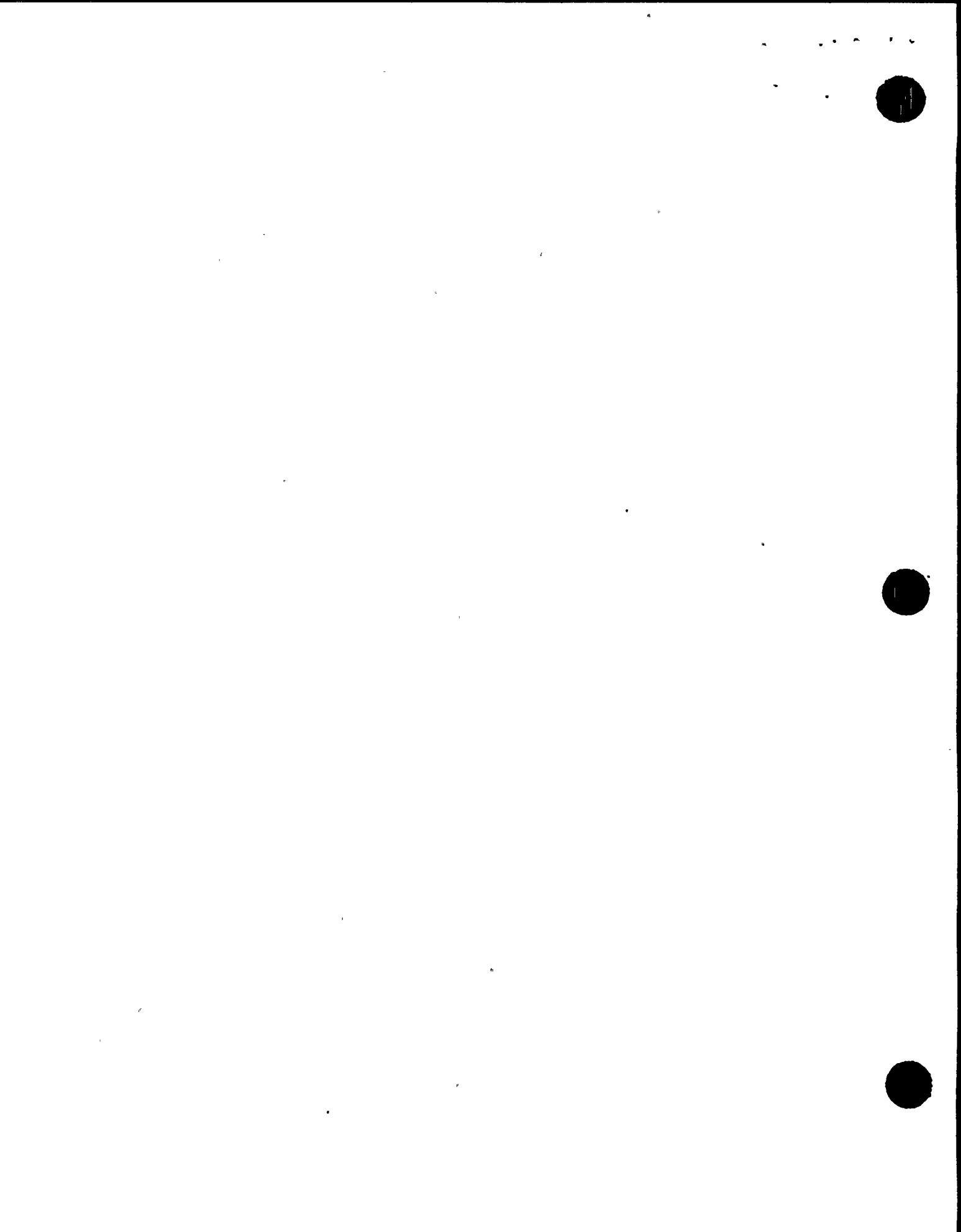
c. Drawing Control

The inspector selected the controlled drawings listed below to determine that the established controls were implemented and that as built drawings are being maintained. The inspector compared the original tracings against the master index (station and corporate); corporate central records aperture card deck; station central records aperture card deck; and applicable hard copies distributed to the control room, test and results, the pipe shop, and station engineering.

<u>Drawing</u>	<u>Revision</u>
33013-422	4
33013-424	4
33013-425	2
33013-426	2
33013-427	2
33013-428	1
33013-431	4
33013-432	1
33013-433	4

No items of noncompliance were identified. However, during this review, the inspector identified the two items discussed below.

- (1) The inspector noted that in an isolated instance (DWG 33013-433 in the pipe shop) a drawing was not of the current revision. During the review of drawing control and modification document packages (paragraph 4) it was determined that the control of drawings, drawing revisions and drawing change notices was in accordance with established requirements. Subsequent to this inspection it was verified that the latest revision of the drawing was issued to the subject location. The inspector had no further questions.
- (2) The inspector identified that three drawings, 33013-425, 33013-426, and 33013-433 had been stamped "For Information Only" prior to issuance to station central records.



These drawings were subsequently issued at the station as controlled drawings. The inspector determined that the drawings were all of the current revision.

The licensee informed the inspector that a new revision to the procedure for issuing the drawings to station central records was forthcoming which would insure that only drawings identified as "as built" would be issued to station central records.

This item is unresolved pending implementation of the new procedure revision and review by RI (244/78-24-06).

d. Tests and Experiments

The licensee informed the inspector that no tests or experiments pursuant to 10 CFR 50.59(b) have been conducted since May 1977, the date of the last QA program inspection.

7. Audits

a. Reference

-- Applicable procedures listed in paragraph 3.

b. Quality Assurance Department Audits

The inspectors selected the sample of reports listed below from those audits performed since the last QA inspection conducted during May 1977.

The inspectors reviewed the audits listed below to verify that they were conducted as follows: in accordance with written checklists/procedures; by trained personnel not having direct responsibilities in the areas audited; with findings documented and reviewed by responsible management; with followup actions initiated/completed; and, with audit frequencies and general audit conduct in accordance with established schedules and procedures.

- 77-16, Audit of Ginna QC Inspection and Surveillance
- 77-26, Audit of Ginna Station Handling, Shipping, and Storage
- 77-27, Audit of Engineering Design Control
- 77-30, Special Audit of Ginna Modification
- 77-42, Ginna Station Modification Project Program



- 77-44, Audit of Ginna Station Modification Control Activities
- 78-01, Audit of Catalytic Inc. Design and Procurement Services
- 78-02, Audit of Gilbert/Commonwealth Continuing Services Activities.
- 78-03, Ginna Station Modification Project Organization
- 78-05, Audit of Engineering Design Control
- 78-08, Audit of Bell/Schneider Project Organization
- 78-13, Ginna Station Modification Project Organization
- 78-14, Audit of Bell/Schneider, A Joint Venture
- 78-16, Engineering Procurement Activities
- 78-17, Purchasing Department Procurement Activities
- 78-25, Ginna Handling, Shipping, and Storage Control
- 78-29, Engineering Design Control
- 78-30, Audit of Bell/Schneider Project

During the conduct of the above audits, the licensee identified 73 items requiring followup action.

The inspector stated that audit reports not reviewed during this inspection may be examined during a subsequent inspection(s).

No items of noncompliance were identified.

8. Unresolved Items

Unresolved items are matters about which more information is required in order to ascertain whether they are acceptable items, items of noncompliance, or deviations. Unresolved items identified during this inspection are discussed in paragraphs 5.c and d, 6.b.(2) and (3), and 6.c.(2).



9. Exit Meeting

The inspectors met with licensee representatives (denoted in paragraph 1) at the conclusion of the inspection on November 16, 1978. The scope and findings of the inspection as stated in this report were presented.

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