



ROCHESTER GAS AND ELECTRIC CORPORATION • 89 EAST AVENUE, ROCHESTER, N.Y. 14649

LEON D. WHITE, JR.  
VICE PRESIDENT

TELEPHONE  
AREA CODE 716 546-2700

September 17, 1980

Mr. Eldon J. Brunner, Chief  
Reactor Operations and Nuclear Support Branch  
U. S. Nuclear Regulatory Commission  
Region I  
631 Park Avenue  
King of Prussia, Pennsylvania 19406

Subject: IE Inspection No. 50-244/80-08  
R. E. Ginna Nuclear Power Plant, Unit #1  
Docket No. 50-244

Dear Mr. Brunner:

This letter is in response to your August 26, 1980 letter received August 28, 1980 concerning the inspection conducted at Ginna Station June 2-5, 1980 by Mr. Napuda of your office. Your letter stated that it appeared that two of our activities were not conducted in full compliance with NRC requirements, as quoted below. This letter contains information in response to these items.

ITEM

- A. "10 CFR 50, Appendix B, Criterion VI states in part, 'Measures shall be established to control the issuance of documents, such as instructions, procedures, and drawings including changes thereto, which prescribe all activities affecting quality. These measures shall assure that documents, including changes, are...distributed to and used at the location where the prescribed activity is performed.'

Contrary to the above, the Control Room was not provided timely 'as-built' information in that: the Control Room copy of drawing number 33013-179, revision 3, March 28, 1980, 'Modification to 6" Steam Hdr. Turbine Driven Auxillary Feedwater Pump,' was not received in the Control Room until June 3, 1980, thirteen days after the modification, EWR 1601, 'Steam Piping - T. D. Aux. Feedwater Pumps' was completed."

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DATE September 17, 1980

TO Mr. Eldon J. Brunner, Chief

RESPONSE

The present method used to complete the drawings after a modification to the plant was made is to make a sketch showing the changes, and a new Engineering Work Request (EWR) is issued by the Station requiring the Superintendent's approval. The EWR with the modification sketch is then sent to Central Records at the plant for distribution to the holders of the Controlled Prints. The EWR is also sent to the Superintendent, Nuclear Production, and then to the Engineering Department for an update of the print.

To avoid the potential of delays Procedure A-603, Control of Engineering Documents by Central Records, has been revised. As proposed, after the sketch of the modification changes is made, the modification project person takes the sketch directly to Central Records, where the original EWR and the modification sketch are then distributed to the Controlled Print areas. The revision of Procedure A-603 will be in effect by October 15, 1980.

ITEM

B. "Technical Specification 6.8.1 states in part, 'Written procedures shall be established, implemented and maintained covering activities referenced below:

- a. The applicable procedures recommended in Appendix 'A' of Regulatory Guide 1.33, November 1972....'

Administrative Procedure A-20, Control Room Logs, revision 9, 8/20/79 section 3.3.2, states in part, 'to void an incorrect log entry, draw one line through the entry and then initial the correction.'

Contrary to the above, the inspector observed improper write over entires contained in the Official Record for May 19, 20, 21 and 23, 1980."

RESPONSE

The Station Superintendent has issued a directive in the form of a letter directing all plant operators to review the current revision of procedure A-20, Control Room Logs, for the proper method of voiding incorrect log entries.

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*Letter*  
ROCHESTER GAS AND ELECTRIC CORP.

SHEET NO. 3

DATE September 17, 1980

TO Mr. Eldon J. Brunner, Chief

The inspection report contains no information that is considered proprietary.

Very truly yours,

*L. D. White, Jr.*

L. D. White, Jr.

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