

U.S. NUCLEAR REGULATORY COMMISSION
REGION I

Report No. 50-244/88-23

Docket No. 50-244

License No. DPR-18

Licensee: Rochester Gas & Electric Company
49 East Avenue
Rochester, New York 14649

Facility Name: R. E. Ginna Nuclear Power Plant

Inspection At: Ontario, New York

Inspection Conducted: October 24-27, 1988

Inspector: *M. Dev*
M. Dev, PE, Reactor Engineer

11/23/88
date

Approved by: *N. Blumberg*
N. Blumberg, Chief
Operational Programs Section, OS, DRS

11/28/88
date

Inspection Summary: Routine unannounced inspection on October 24-27, 1988
(Inspection Report No. 50-244/88-23)

Areas Inspected: Review of the licensee's receipt, storage and handling of
equipment and materials.

Results: The inspector identified concerns that the station stockroom had not
conducted an inventory check of safety-related equipment and spare parts in
the stockroom. Several such items were below the minimum inventory level
required as delineated in the stockroom equipment and spare parts cards, and
no actions were taken to replenish them (paragraph 2.3.4). The station
management has not resolved the station corrective action report No. 1833
(October 1987) which addressed the lack of preventive maintenance for the
stored items. Consequently, the licensee has not established a list of spare
parts and equipment in the stockroom requiring preventive maintenance (PM), the
procedures for performing PM and a PM schedule (paragraph 2.3.3). Some QA hold
items were found not segregated from the new consignments in the station
receiving area (paragraph 2.3.5). The QC semi-annual surveillance reports
(1988) reviewed did not sufficiently document the scope and the surveillance
activities performed (paragraph 2.4).

The licensee audit program implementation related to Bell Power Generation
Service Corporation quality controlled activities of the plant modifications
were determined to be adequate.



DETAILS OF INSPECTION

1.0 Persons Contacted

Licensee Representatives:

- D. Bryant, QC Engineer
- J. Doyle, Site Engineer (Contractor)
- W. Hess, Receiving Inspector (Contractor)
- J. Hotchkiss, Modifications Project Engineer
- M. Leyrer, Stockroom Foreman
- * R. Marchionda, Training Manager
- * R. Mecredy, General Manager Nuclear Production
- * T. Meyer, Director QA/QC
- K. Nassauer, QC Engineer
- * M. Shaw, Administrative Service Manager
- * S. Spector, Superintendent, Ginna Station
- * B. Stanfield, Associate QC Engineer
- G. VanArtsdalen, Project Engineer, Maintenance

United States Nuclear Regulatory Commission (US NRC)

- * C. Marschall, Senior Resident Inspector

* Indicates those attended the exit meeting on October 27, 1988.

The inspector also contacted other licensee's technical and administrative personnel during the course of this inspection.

2.0 Receipt Storage and Handling of Equipment and Materials (Module 38702)

2.1 Scope

The scope of this inspection was to ascertain whether the licensee was implementing a QA program relating to the control of receipt, storage and handling of equipment and materials conformance with regulatory requirements, licensee's commitments, and industry guides and standards listed in Attachment-1.

2.2 Program Review and Implementation

The inspector reviewed the licensee's administrative procedures listed in Attachment- 1 for the control of receipt, inspection and acceptance, and handling of spare parts and equipment at Ginna. In addition, Bell Power Generation Service Corporation (Bell), the licensee's agent, also receives, inspects, stores and handles site materials and equipment procured for plant modifications by the licensee. The licensee reviews and audits Bell's quality control activities on a yearly basis to determine the adequacy and effectiveness of their QA program.



2.3 Findings

2.3.1 Storage of Materials

The inspector toured the licensee's two indoor facilities used for the storage of safety-related replacements and parts. These facilities were access controlled and displayed the names of the plant personnel authorized to requisition materials from the stockroom. The storage facility located in the auxiliary building meets Level B storage requirements. Racks with location designation are used for storage of spare parts. Two ovens for welding rods are also located in this area. They were found to have been recently inspected and displayed proper identification and markings. The inspector also toured the receiving area and the storage facility of Bell on-site. The facility was adequately maintained.

2.3.2 Identification and Control of Materials and Parts

The licensee's stockroom uses equipment and parts cards to control the inventory of safety-related items at Ginna. In addition, the stockroom also uses a computerized maintenance information system (MIS) to supplement the station inventory control. The inspector discussed the use of the MIS with cognizant planning and warehouse personnel. The inspector selected three equipment numbers, one each for a temperature element, a level transmitter, and a pressure transmitter using their unique equipment identification numbers. The status of the inventory could not be verified using the MIS. There is apparent lack of agreement between MIS and equipment inventory due to partial data acquisition and incomplete equipment information.

The inspector verified that stored spare parts were properly tagged and identified. However, some deficiencies were identified. In one instance, the inspector noted that a Potter Brumfield relay and Eberline relays had been identified by the same part number (6234), even though their model, configuration and functions were different. In another instance, a 5 HP motor, NEG-98441-79-1 procured in 1979 was recently transferred to the stockroom from the field warehouse. The stockroom personnel inspected the consignment and identified that the motor specification did not meet the purchase order requirements. On August 26, 1988 the motor was put on QA



hold. These instances indicate lack of proper inspection and verification of the stockroom inventory. The licensee is aware of these problems and is evaluating corrective actions as part of the station Q-list update program to improve identification, inspection and storage of spare parts and equipment in the stockroom. The inspector did not have further question at this time.

2.3.3 Preventive Maintenance (PM) of Spare Parts

Administrative Procedure A-1304 provides for periodic inspection and maintenance performed on spare parts stored in the stockroom which have special requirements. Administrative Procedure A-1301 provides instructions for maintenance and inspection of material handling equipment at Ginna. The inspector discussed with the licensee representatives the PM activities for the stored items requiring PM, specifically an RHR pump motor #80C19252 stored in the stockroom. Review of the stockroom inventory indicated that this motor was not even listed in the stockroom inventory list. However, based on the review of the maintenance log and discussion with the cognizant maintenance and stockroom personnel, the inspector determined that the electrical maintenance department had conducted PMs for this motor but did not document the PM activities, and maintain records for lack of a PM procedure. Also, the licensee had not developed a list of spare parts and equipment in the stockroom which require PM, nor had established a PM schedule to accomplish such activities. Discussion with the cognizant maintenance personnel indicated that the licensee initiated a corrective action report (CAR-1833) in October 1987 to address these issues. However, no prompt actions have been taken to resolve the concerns stated in the CAR, and to institute a PM program for the spare parts and equipment in the stockroom. The licensee representative stated that the station maintenance department is currently coordinating with other disciplines at the site to finalize a PM schedule and establish procedures to implement PM program to the stock items. Pending implementation of the licensee's PM program for the spare parts and equipment in the stockroom, and verification of its adequacy by the NRC, this item is considered an unresolved issue (50-244/88-23-01).



Lack of equipment control and retrievability was also evident for Q classified Chain Falls BKW-04 and BKW-47 used for station lifting and hoisting activities. These chain falls were issued to the station maintenance department personnel in July 1985 and had not been inspected, as required by the station Administrative Procedure A-1301 since then. The stockroom personnel stated that the mechanical maintenance department had been requested to retrieve the chain falls and return them to the stockroom for inspection and certification so that unqualified use of the equipment for any safety-related activities could be avoided. The maintenance department had not responded to the stockroom request and as such, the chain falls had not been retrieved yet. The stockroom foreman has escalated action to retrieve them or otherwise declare them unusable at the site. The inspector did not have further questions at this time.

2.3.4 Stockroom Inventory

The inspector reviewed the equipment and spare parts cards and verified the inventory of selected items in the stockroom. The spare parts cards had identified minimum and maximum inventory required for these items. Several of these items in stock were below minimum required inventory level (see Attachment-1). In another instance, the inspector noted that some of the stock materials and spare parts were not properly rotated. These spare parts had been in the station stock for several years and were not used while the recently procured replacement items were issued for use. These instances indicated that the licensee lacked proper control and verification of stockroom inventory, and an initiative to procure the deficient items to replenish the inventory in a timely manner. The licensee is currently evaluating corrective actions to improve procurement activities.

2.3.5 Receipt Inspection

The inspector reviewed receipt inspection documentation, and selected nonconformance reports (NCRs) for material deficiencies identified by the licensee QC inspectors and the Bell QC inspectors. The licensee's receipt inspection log entries in several instances were found inconsistent: Accept/Reject status of the materials inspected was not identified; and applicable NCRs and the status of associated dispositions were not referenced to indicate when these nonconforming materials were accepted by the receipt inspectors. A licensee representative initiated



corrective measures to update the entries and provided documentation to support the adequacy of the receiving inspections.

The inspector also noted that the licensee QA hold items were not segregated from the new consignment marked for QC inspection, in accordance with the requirements of ANSI N45.2.2-1972. For example, Part No. 34256-244-4227, MSIV Stud was on QA hold since May 2, 1988, and Part No. NQ-10915-B-JD, Valve Positioner since July 14, 1988, and were kept in the receiving area awaiting disposition. Lack of initiative on the part of the station engineering department and the maintenance department is an apparent cause of delay in disposition of these materials. A licensee representative stated that the QA hold materials will be segregated and the station QC group will followup their dispositions with the cognizant station departments. Pending disposition of these QA hold materials to avoid their inadvertent unqualified use, this issue is considered an unresolved item (50-244/88-23-02).

2.4 QA/QC Interfaces

The licensee QA group conducts audits of the station activities of receipt, storage and handling of equipment and materials at Ginna on yearly basis. An audit of these areas is scheduled for November 1988. Based on the review of the station stockroom activities, QA documentation including audits and discussion with cognizant personnel, the inspector determined that the QA audits lack in-depth review and verification of the stockroom activities.

The station QC conducts surveillance of stockroom activities on a semiannual basis. The inspector reviewed a recent surveillance report. The report did not indicate the scope and activities that were covered by this surveillance report. The licensee representative stated that a checklist has been prepared and the QC inspectors are required to follow this checklist to perform surveillances. Subsequently, a cognizant QC engineer reviews the report, and upon completion of all required actions the report is signed off and sent to the central document control center. The inspector noted that the surveillance report was in fact reviewed by the cognizant QC engineer as indicated by the surveillance report log. However, the adequacy of the surveillance could not be determined for lack of adequate documentation of the activities performed. Lack of sufficient documentation of the stockroom surveillance to delineate the scope, and the surveillance activities performed is considered an unresolved issue (50-244/88-23-03).



The inspector reviewed the licensee QA audits (listed in Attachment-1) of Bell's procurement, storage and handling activities, and overall programmatic compliance to Ginna station QA requirements. The audits were properly coordinated, and the audit findings were comprehensive. Bell had resolved the audit findings and implemented the required corrective actions in a timely manner.

2.5 Conclusion

Based on the review of the licensee's documentation and activities of receipt, storage and handling of equipment and materials, and discussion with the cognizant plant personnel, the inspector determined that certain activities were not adequately controlled and properly implemented. For example, the MIS which supplements the stockroom equipment and parts cards for control of spare parts inventory is not very useful for lack of complete data acquisition.

The licensee had not established a list of spare parts and equipment in the stockroom requiring preventive maintenance (PM), the PM procedures, and a PM schedule. For lack of PM procedure and guidelines, the PM for RHR pump motor in the stockroom was not documented and records maintained. Control of the material handling equipment was also inadequate as evidenced by untraceability of chain falls which have not been inspected and certified for use since 1985.

The licensee lacks proper control and verification of stockroom inventory. Some safety-related items are below minimum required stock inventory level as delineated in the equipment and spare parts cards, and no actions were taken to replenish them. Also, some stock items were not properly rotated, thus, leaving the older items still on the shelf while the new replacement items were issued for use. Review of a recent semi-annual QC surveillance report of the stockroom activities indicated that the report did not sufficiently document the scope and the surveillance activities covered by this surveillance.

The licensee's material receipt inspection activity is adequate. However, in several instances, the receipt inspection logbook did not reference the NCRs and associated disposition for the nonconformances identified by the QC inspectors during receipt inspections. QA hold items and new consignment assigned for QC inspection were found mixed together instead of kept being segregated. Some of these QA hold items have not been dispositioned in a timely manner for apparent lack of initiatives of the station engineering support and the maintenance department.



Review of the licensee audits of Bell's quality controlled activities at Ginna, and discussion with the cognizant plant personnel, the inspector determined that the receipt, storage and handling of project related equipment and materials were properly conducted by Bell personnel.

3.0 Unresolved Items

Unresolved items are matter about which more information is required in order to ascertain whether they are acceptable items or violation. Three unresolved items have been discussed each in paragraphs 2.3.3, 2.3.5 and 2.4.

4.0 Management Meetings

The licensee management was informed of the scope and purpose of the inspection at the entrance interview on October 24, 1988. The findings of this inspection were discussed with the licensee representatives during the course of this inspection and presented to the licensee management at the exit interview on October 27, 1988 (See paragraph 1.0 for attendees).

At no time during this inspection were written materials given to the licensee. The licensee did not indicate that any proprietary information was involved within the scope of this inspection.



ATTACHMENT-1

1.0 Procedures/Manuals/Instructions

R. E. Ginna Technical Specifications
R. E. Ginna Final Safety Analysis Report
ANSI N18.7-1972, Administrative Controls for Nuclear Power Plants
ANSI N45.2.2-1972, Packaging, Shipping, Receiving, Storage and Handling of Items for Nuclear Power Plants
ANSI N45.2.13-1977, Quality Assurance Requirements for Control of Procurement Items and Services for Nuclear Power Plants
Regulatory Guide 1.33, Revision 0, Quality Assurance Requirements (Operation)
Ginna Station Quality Assurance Manual
Procedure A-401, Control of Procurement Documents Prepared at Ginna Station, Revision 16
Procedure A-701, Receipt and Acceptance of Materials and Parts, Revision 12
Procedure A-802, Identification and Marking of Accepted Materials, Parts and Components, Revision 4
Procedure A-1301, Maintenance and Inspection of Material Handling Equipment, Revision 9
Procedure A-1303, Storage and Preservation of Materials and Equipment at Ginna Station, Revision 14
Procedure A-1304, Storage of Materials Requiring Periodic Inspections, Revision 3
Procedure A-1501, Control of Nonconforming Items, Revision 7
Procedure A-1502, Nonconformance Report, Revision 11

2.0 Audit Reports/Surveillance Reports/Nonconformance Reports (NCRs)

88-24:PB, Safety Related Procurement Activities of Bell Power Generating Service Corporation, June 15-16, 1988
88-33:DH, Audit of Bell Power Generating Service Corporation Programmatic Activities, August 17-19, 1988

Quality Control Report QCR-88-0836, Schedule Surveillance
Quality Control Report QCR-880968, Purchase Order No. NQ-10915-B-JD

NCR G-88-303 for PO No. NQ-11081-B-JD, June 16, 1988
NCR G-88-310 for PO No. NQ-10930-B-JD, June 30, 1988
NCR G-88-316 for PO No. NQ-10961-B-JD, June 28, 1988
NCR G-88-378 for PO No. NQ-10636-B-JD, September 12, 1988
NCR G-88-391 for PO No. NQ-11069-B-JD, September 30, 1988

2.3.4 Stock Inventory

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| Part No. 5427, Diaphragm, Quantity Available 1, Minimum Required | 3 |
| 6008, Packing, | 1 |
| 9341, 3-Valve Manifold, | 0 |
| 1003, 3/4" Globe Valve, | 5 |
| 7021, Marker | 0 |
| | 10 |

