



ROCHESTER GAS AND ELECTRIC CORPORATION • 89 EAST AVENUE, ROCHESTER, N.Y. 14649-0001



NEW YORK STATE

TELEPHONE AREA CODE 716 546-2700

February 21, 1986

Dr. Thomas E. Murley, Regional Administrator
U. S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

Subject: I & E Inspection Report 85-26
Notice of Violations
Technical Specification Designated Effluent Monitoring System
R.E. Ginna Nuclear Power Plant, Unit No. 1
Docket No. 50-244

Dear Dr. Murley:

In accordance with the above subject which stated:

"As a result of the inspection conducted on December 1 through December 31, 1985, one violation of NRC requirements was identified. The violation involved the failure to adhere to Station Administrative Procedures.

Technical Specification 6.8 states that written procedures shall be established, implemented, and maintained covering activities referenced in Appendix A of Regulatory Guide 1.33, November 1972.

Appendix A of Regulatory Guide 1.33, November 1972, paragraph I.5, states that general procedures for the control of maintenance, repair, replacement and modification work should be prepared and included methods for obtaining permission and clearance for personnel to perform the work.

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Ginna Station Administrative Procedures A-1603, "Maintenance Work Request and Trouble Report", states that maintenance Work Request and Trouble Reports, (MWR's) are a method to control maintenance work at Ginna Station and require the review of the Operations Shift supervisor or his designee to ascertain the impact of MWR's on plant systems and Technical Specifications.

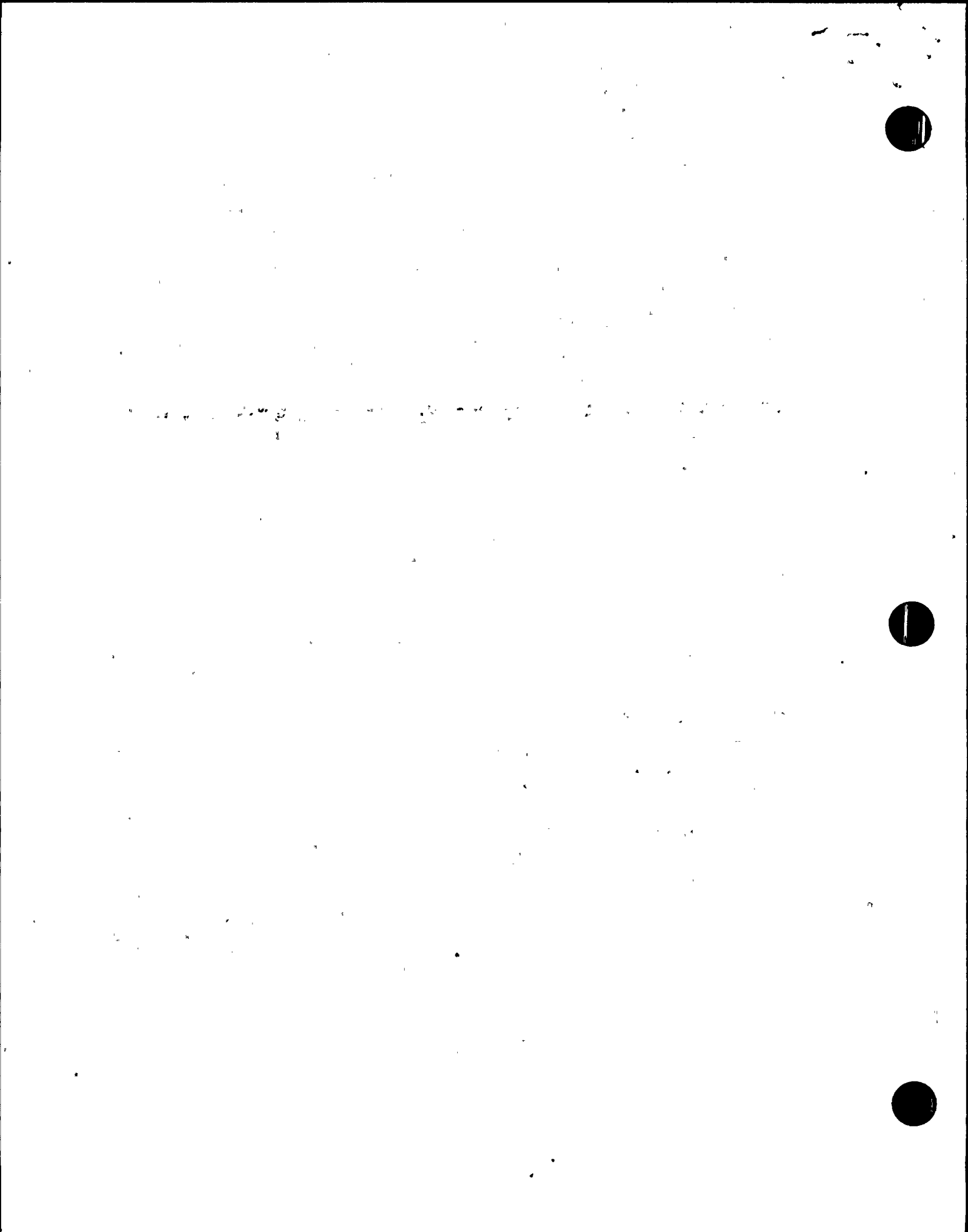
Contrary to the above, on December 3, 1985 the licensee did not use a MWR to control the installation of the new chlorine monitor in the stations' State Pollutant Discharge Elimination System. As a result, a Technical Specification designated effluent monitoring system, connected by a common sample line, was disconnected and remained so for approximately 13 days until identified by the licensee.

the following is submitted in response.

RG&E does not concur with this violation as stated on the following basis:

Regulatory Guide 1.33 November 1972 identifies that written procedures, documented instruction or drawings should be used for maintenance which can affect the performance of safety related equipment. While the importance of maintaining the radiological environmental monitoring equipment in optimum working order is understood, the equipment identified in this violation is not included in the safety related equipment identified in Regulatory Guide 1.33. The chlorine monitor that was being replaced is not a part of the radiological environmental monitoring program identified in the Technical Specifications.

Technical Specifications Section 3.16.1.2 identifies the required corrective action in the event of failure of the automatic sampling equipment is "efforts shall be made to complete corrective action prior to the end of the next sampling period." In the case of this equipment, that would be within 31 days. Adequate surveillance and checking is performed on this system to ensure compliance with Technical Specifications. Upon discovery, immediate corrective action was implemented to restore the monitor to service.

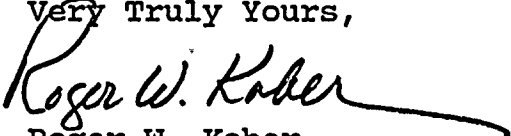


Relative to the use of a MWR to control maintenance work, our Quality Assurance Manual Appendix A requires controls be established on the calibration and maintenance of process instrumentation used to verify Limiting Conditions for Operation (LCO) in Technical specifications. The radiological environmental monitoring program is not subject to LCO requirements.

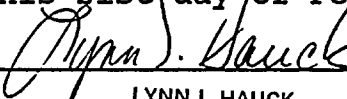
We therefore, believe that the item identified here is not in violation of NRC requirements.

To improve control in this area, however, RG&E's planned corrective action is to 1) install separate isolation valves for each of the samplers, 2) install a properly designed sample container for the effluent sampler and label it to its purpose 3) evaluate the adequacy of the other effluent monitoring system associated with the retention tank and modify as deemed necessary.

Very Truly Yours,


Roger W. Kober

Subscribed and sworn to me
on this 21st day of February, 1986.



LYNN I. HAUCK

NOTARY PUBLIC, State of N.Y., Monroe County
My Commission Expires March 30, 1986

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