

APPENDIX A

Notice of Violation

Rochester Gas and Electric Corporation
Ginna Station

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

As a result of the inspection conducted on January 27-31, 1986, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violations were identified:

- A. 10 CFR 50, Appendix B, Criterion XVI states: "Measures shall be established to assure that conditions adverse to quality, such as failures... and nonconformances are promptly identified and corrected."

Contrary to the above, as of January 31, 1986, the nonconformances identified in Audit No. 84-15 and again in Audit No. 85-11 to address the inadequacies in the inspection of critical welds on the reactor vessel head and internals lifting rigs were not adequately corrected in that: (1) Refueling Procedure RF-60 was not revised to clarify the visual inspection requirements for the lifting rigs and (2) the hold/witness point in the RF procedure (paragraph 8.2.2) did not require confirmation of the completion of MHE-1100 procedure steps as stated in the corrective actions for the finding in Audit 84-15:SB.

This is a Severity Level IV Violation (Supplement I).

- B. 10 CFR 50, Appendix B, Criterion VII states: "Measures shall be established to assure purchased material...conform to the purchase document... These measures shall include provisions, as appropriate for source evaluation...examination of product upon delivery..."
1. Ginna Station Quality Assurance Manual Section 4, Paragraph 3.2.7 states: "The receipt inspection method shall be utilized for procurement of off-the-shelf-items...and for which neither quality assurance controls exist nor are necessary to ensure a quality product acceptance...the suppliers of items procured utilizing the Receipt Inspection method need not be evaluated and qualified as required by Section 7 of the Quality Assurance Manual. Items are normally accepted by performing receipt inspection for identification, damage and attributes important to safety."
 2. Section 7 of Quality Assurance Program for Station Operation (Revision 11) states: "Ginna Station, General Maintenance, Quality Assurance and Electric Meter and Laboratory evaluate the suppliers of inspection, test and calibration services which they intended to use."

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Contrary to the above, as of January 31, 1986:

1. Safety related stainless steel wire rope for the auxiliary building crane, an item purchased under Purchase Order No. NEG 50942, from a supplier not evaluated and qualified as required by the quality assurance manual, was accepted without performing a receipt inspection to verify that the chemical composition and the breaking strength, two attributes important to safety, were traceable from the product to the reports provided by the supplier.
2. Calibration services for direct read out gauges for HY 10SL Hydraulic Torque Wrenches were purchased from a supplier who was not evaluated by Ginna Station, General Maintenance, Quality Assurance and Electric Meter and Laboratory.

The above collectively constitute a Severity Level IV violation (Supplement I).

- C. 10 CFR 50, Appendix B, Criterion III states: "The design control measures shall provide for verifying or checking the adequacy of design... The verifying or checking process shall be performed by individuals other than those who performed the original design..."

Rochester Gas and Electric Procedure QE 303, (Revision 8) paragraph 3.6.4 states: "The Engineering Manager or Lead Engineer shall review the (Engineering) drawing for compliance with this procedure and technical adequacy..."

Contrary to the above, as of January 31, 1986, the circuit schedules which specified cable conductor terminations for circuits G-1234, G-1235, G-1237 and G-1244 in safety related Engineering Work Request No. 4067 were prepared and reviewed by the same responsible engineer.

This is a Severity Level IV violation. (Supplement I).

- D. 1. 10 CFR 50, Appendix B, Criterion V states in part: "Activities affecting quality shall be prescribed by documented instructions, procedures or drawings of a type appropriate to the circumstances and accomplished in accordance with these instructions procedures and drawings. Instructions, procedures and drawings shall include appropriate quantitative and qualitative acceptance criteria..."

Ginna Station Procedure M-32.1 on page M-32.1-7 requires a megger test for circuit breakers.

2. 10 CFR 50, Appendix B, Criterion II states: "The (Quality Assurance) Program shall provide for indoctrination and training for personnel performing activities affecting quality as necessary to assure that suitable proficiency is achieved and maintained..."

Contrary to the above, on January 30, 1986:

1. Procedure M-32.1 for performing maintenance of the circuit breakers for component cooling system 'B' pump was inappropriate to the circumstances in that it did not specify the acceptance criteria for measuring the resistance of the circuit breaker.
2. The personnel performing the activity and the quality control technician witnessing the activity were not proficient in that the maintenance personnel meggered the above circuit breaker using an instrument (Biddle Catalogue No. 21805-1) whose calibration expired on April 27, 1984 and the quality control technician who monitored the activity failed to verify the calibration status of this instrument prior to its use.

The above collectively constitute a Severity Level IV violation.
(Supplement I)

Pursuant to the provisions of 10 CFR 2.201, Rochester Gas and Electric Corporation is hereby required to submit to this office within thirty days of the date of the letter which transmitted this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending this response time.