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April 25, 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 86-03
Notice of Violation
Containment Integrity Technical Specification Requirements For Refueling Were Violated While Maintenance Was Being Performed, Concurrently, On Vital Bus 14

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 February 9 through February 28, 1986, one violation of NRC requirements was identified. The violation involved the failure to adhere to Station Technical Specifications.

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, paragraph 1 discusses procedures for performing maintenance.

The Ginna Station Quality Assurance Manual program description requires implementation of Regulatory Guide 1.33, November 1972, which endorses American National Standards Institute (ANSI) N18.7-1972. ANSI N18.7-1972 states in paragraph 5.1.6.3, "planning (of maintenance) shall consider the possible safety consequences of concurrent or sequential maintenance, testing, or operating activities. Equipment required to be operable for the mode in which the reactor exists shall be available."

Contrary to the above, maintenance procedures were not adequately established, implemented and maintained, in that, preventive maintenance performed on Vital Bus 14 and Motor Control Center 1C violated containment

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integrity requirements for refueling operations on February 15 and 16, 1986. Containment isolation motor-operated valves 313 and 813 were deenergized and open for a period of approximately ten hours without their respective downstream isolation valves locked closed, as required by Technical Specification 3.8.1.a.

The following is submitted in response.

We believe the root cause of this event is due to not thoroughly reviewing the impact of the removal of MCC 1C relative to Technical Specification 3.1.8.1.a. Our root cause analysis revealed the following:

- o The error is not a result of a lack of knowledge.
- o That procedure changes will not prevent related generic problems.
- o Means exist to ensure that proper conditions are established for each mode of plant operation - based on the self identification of event.
- o That it is a shared staff responsibility to plan and schedule concurrent activities.
- o That operations personnel should be cognizant of the status of plant systems and equipment under their control and should ensure that they are controlled in a manner that supports safe and reliable operation.
- o That the ultimate responsibility for plant status controls lies with the Shift Supervisor.

Our actions to address this specific event are:

1. The staff has discussed this violation and has concluded the most appropriate corrective action for us is to ensure that all sections thoroughly and independently review planned actions.

2. The Operations Manger will present this violation to his Shift Supervisors at the next Shift Supervisors meeting. The discussion will stress job responsibilities and the need to ensure adherence to station policies, procedures, and Technical Specifications.

We concur that maintenance planning needs to be strengthened as identified in this violation and the violation in Inspection Report 85-26.

To ensure that all station maintenance activities are reviewed and appropriately evaluated for their affect or potential impact on Technical Specification required and safety related

equipment the following short term actions will be completed by June, 1986.

1. Plant managers will stress the requirement that all plant personnel maximize the use of the maintenance work request and trouble report (MWR) to initiate maintenance.

2. Maintenance Manager will provide training session to all maintenance supervisors and foremen during weekly meeting. The session will address A-1603 (Maintenance Work Request and Trouble Report) procedure on the establishment of conditions required to perform maintenance.

3. Each maintenance shop foreman will provide his own training session to his assigned personnel.

4. The Operations Manager will draft a memo to be attached to plan of day reinforcing operating personnel of their role in control of maintenance activities.

5. Certain collateral duties currently assigned to the Maintenance Supervisor will be assigned to another employee. This will increase the supervisor's availability to provide more time for planning and control of maintenance activities.

Long term action to enhance the control of maintenance activities will continue via the implementation of our computerized Maintenance Information System. The MIS target completion date for full implementation is January, 1988.

Very truly yours,

Roger W. Kober

Roger W. Kober

Subscribed and Sworn to me on this 25th day of April, 1986.

Lynn I. Hauck

LYNN I. HAUCK
Notary Public in the State of New York
MONROE COUNTY
Commission Expires Nov. 30, 19...