

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 February 5-15, 1985, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violation was identified:

10 CFR 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings" requires that activities affecting quality be prescribed by documented procedures and accomplished in accordance with these procedures.

Ginna Station Quality Assurance Manual, Section No. 5, Paragraph 5.1 "Instructions, Procedures, and Drawings" states, in part, that "activities affecting quality will be conducted in accordance with documented instructions and procedures.

Contrary to the above, as of February 15, 1985 it was determined that the valve preventive maintenance program reviews and valve inspections were not being accomplished as prescribed in Administrative Procedure A-1020, "Valve Preventive Maintenance Program," Revision 2, March 7, 1984.

This is a Severity Level V 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.

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1. The first step is to identify the key components of the system. This includes understanding the hardware, software, and data involved.

## APPENDIX B

### NOTICE OF PROGRAM STRENGTHS

Rochester Gas and Electric Corporation  
R. E. Ginna Station

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

The inspection conducted February 5-15, 1985 identified several program strengths. A program strength is a positive attribute or feature which exceeds regulatory requirements, or an innovative feature which contributes to the safety or effectiveness of plant activities.

- A strong commitment to the ALARA program has been established at the site.
- The Nuclear Safety Audit and Review Board is composed of members with extensive experience and qualifications. The board reviews are thorough, detailed, rigorous and conscious of safety. This is accomplished without an updated charter or detailed administrative procedures.
- The plant staff and supporting staff members are experienced and well qualified, particularly in maintenance, operations, Quality Control and Results and Tests.

APPENDIX C

NOTICE OF PROGRAM WEAKNESS

Rochester Gas and Electric Corporation  
R. E. Ginna Station

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The inspection conducted February 5-15, 1985 identified three areas of concern which have been characterized as weaknesses. Weaknesses do not constitute noncompliances but are matters that if left uncorrected could lead to problems and/or noncompliances.

- The documentation of activities associated with maintenance such as Maintenance History Cards, Maintenance Work Requests and Quality Control Surveillance Reports (corrective action requests) is neither timely nor complete.
- No continuing or refresher training for long time employees was noted, as well as very slow implementation of a previously developed training program for maintenance personnel.
- The control of Measuring and Test Equipment and tracking its use has several deficiencies; corrective action for previous Quality Assurance audit findings in this area requires continued attention.