



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
631 PARK AVENUE
KING OF PRUSSIA, PENNSYLVANIA 19406

Docket No. 50-244

DEC 28 1983

Rochester Gas and Electric Corporation
ATTN: Mr. John E. Maier
Vice President
Electric and Steam Production
49 East Avenue
Rochester, New York 14649

Gentlemen:

Subject: Inspection 50-244/83-234

This refers to the special safety inspection conducted by Mr. R. P. Zimmerman of this office on October 18, 1983 through November 18, 1983 at the R. E. Ginna Nuclear Power Plant of activities authorized by NRC License No. DPR-18 and to the discussions of our findings held by Mr. Zimmerman with Mr. B. Snow and other members of your staff periodically during the inspection.

Based on the results of this inspection, it appears that certain of your activities were not conducted in full compliance with NRC requirements, as set forth in the Notice of Violation, enclosed herewith as Appendix A. These violations have been categorized by severity level in accordance with NRC Enforcement Policy (10 CFR 2, Appendix C) published in the Federal Register Notice (47 FR 9987) dated March 9, 1982. You are required to respond to this letter and in preparing your response, you should follow the instructions in Appendix A. We note that you have corrected Item No. 2 of Appendix A, and therefore need not address in your response, unless desired, those actions taken regarding the deficiencies noted in the Project QA Storage Area.

The problems discussed in this inspection report and Appendix A relate to poor administrative practices. Proper documentation and review are essential ingredients of the management control process. In particular, we are concerned about the apparent lack of overview and control regarding plant modifications. Most recently, the Post Accident Sampling System, a modification installed by a contractor, was apparently placed in service without conducting the required reviews to assure that the system had been properly installed and tested. In this instance it also was evident that there was a general lack of awareness regarding procedure status, open items and project quality control concerns on the part of key staff, including the Plant Operations Review Committee. Consequently, in response to NRC concerns, further effort was required on your part to assure proper operability of the system, including correction of mechanical problems.

This general topic has been the subject of previous correspondence, including my letter to you dated December 28, 1982 and your response of February 17, 1983. Additionally, we have discussed your corrective actions in this area at meetings held on September 21, 1982, June 1, 1983 and July 21, 1983. Based on these efforts we have to conclude that your corrective actions to date have not been sufficiently effective. Consequently, in preparing a response to Item No. 1 of Appendix A, please reassess your corrective actions in light of both current and past findings. Your response should describe a program,

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revised as necessary in light of your reassessment, to be implemented to assure that comprehensive improvements will be achieved in the performance of plant modifications. A piecemeal approach will not be acceptable in light of the recurrent nature of this problem.

In accordance with 10 CFR 2.790(a), a copy of this letter and the enclosures will be placed in the NRC Public Document Room unless you notify this office, by telephone within ten days of the date of this letter and submit written application to withhold information contained therein within thirty days of the date of this letter. Such application must be consistent with the requirements of 2.790(b)(1). The telephone notification of your intent to request withholding, or any request for an extension of the 10 day period which you believe necessary, should be made to the Supervisor, Files, Mail and Records, USNRC Region I, at (215) 337-5223.

The responses directed by this letter and the accompanying Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Your cooperation with us in this matter is appreciated.

Sincerely,



Richard W. Starostecki, Director
Division of Project and Resident
Programs

Enclosures:

1. Appendix A, Notice of Violation
2. NRC Region I Inspection Report No. 50-244/83-23

cc w/encls:

Harry H. Voigt, Esquire
Central Records (3 copies)
Director, Power Division
Public Document Room (PDR)
Local Public Document Room (LPDR)
Nuclear Safety Information Center (NSIC)
NRC Resident Inspector
State of New York

bcc w/encls:

Region I Docket Room (with concurrences)
Senior Operations Officer (w/o encls)
DPRP Section Chief