

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

TELEPHONE
AREA CODE 716 546-2700

April 13, 1981

Mr. Boyce H. Grier, Director
U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

Subject: I & E Inspection Report 81-01
Notice of Violation
Failure to Develop Procedures
Addressing Regulatory Guide 1.39
R. E. Ginna Nuclear Power Plant, Unit No. 1
Docket No. 50-244

Dear Mr. Grier:

In accordance with the above subject which stated:

As a result of an inspection conducted on January 12-16, 1981 and in accordance with Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violation was identified:

10 CFR 50, Appendix B, Criterion V states in part, "Activities affecting quality shall be prescribed by...procedures...of type appropriate to the circumstances..."

Quality Assurance Manual Ginna Station, Section No. 1, Quality Assurance Program, states in part,

"2.3.a (Ginna Station Responsibility to) Establish written procedures to control performance of quality affecting activities..."

"3.2.1 The quality assurance program shall be documented in...the implementing quality assurance/administrative procedures..."

"3.2.3.g (This manual...conforms to...) NRC Regulatory Guide 1.39, Revision 2, (9/77) 'Housekeeping Requirements for Water-Cooled Nuclear Power Plants.'"

Regulatory Guide 1.39 requires conformance to the requirements of ANSI N45.2.3-1973, "Housekeeping During the Construction Phase of Nuclear Power Plants'."

Contrary to the above, plant procedures had not been issued implementing the housekeeping and cleanliness requirements of many portions of ANSI N45.2.3.

the following is submitted in response.

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The cause for failure to develop these procedures was determined to be an oversight by Ginna Station partly due to the fact that this subject was not addressed by our QA Manual.

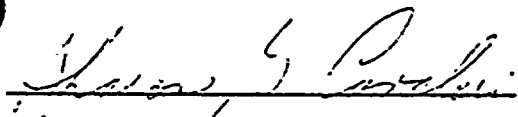
To correct the lack of procedures, Administrative Procedure A-1306 has been developed. This procedure is presently in draft form and is being routed through the plant staff for comment. Following resolution of any comments, the procedure will be PORC reviewed and approved for use. This procedure shall be effective by July 1, 1981.

Additionally, discussions between plant management and corporate QA are being conducted to determine the need for incorporation of these guidelines into the QA Manual. Results of these discussions shall be included in RG&E's additional response due July 1, 1981.

Very Truly yours,


John E. Maier

Subscribed and sworn to me
on this 16th day of April 1981.



SHARON G. CAVALERI
NOTARY PUBLIC, State of N. Y., Monroe County
My Commission Expires March 30, 1983

