APPENDIX A

NOTICE OF VIOLATION

Rochester Gas and Electric Corporation Ginna

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

As a result of the inspection conducted on April 1, 1981 through April 30, 1981 and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified:

A. Technical Specification 1.4 defines Operable as "Capable of performing all intended functions in the intended manner."

FSAR Section 8.1.1 states, in part, "Two diesel generator sets are connected to the engineered safety feature buses to supply emergency shutdown power in the event of loss of all other a.c. auxiliary power."

Technical Specification 3.7.2.b states, in part, "Power operation may continue if one diesel generator is out of service provided (a) the remaining diesel generator is run continuously..."

Contrary to the above, on April 7, 1981, the 'B' Diesel Generator was not run continuously when the 'A' Diesel Generator electrical breaker to engineered safety feature Bus 18 was taken out of service.

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

B. Technical Specification 3.1.5.1 states, in part, "An investigation to determine the location of the leakage from the primary coolant shall be initiated ... The reactor shall be placed in a hot shutdown condition or the leaking sections isolated within 24 hours... if (a) Any leakage from the reactor coolant system pressure boundary is known to be through a pipe, vessel, or valve body..."

Contrary to the above, as of April 15, 1981, a leakage investigation of the letdown system performed on April 10, 1981 was not adequately conducted to conclusively indicate that a primary coolant leak had been acceptably isolated; in that, the letdown line suction valve (427), which is designed to fail open, served as the means of isolation between the Reactor Coolant System (RCS) and a potentially suspect section of RCS pressure boundary piping which had not been confirmed to be intact.

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

C. Technical Specification 6.9.2.b.2 requires a written report to be submitted to the NRC Regional Office within thirty days following a condition leading to operation in a degraded mode permitted by a limiting condition for operation.

Contrary to the above, as of April 30, 1981, written reports were not submitted for the following instances of operation in a degraded mode permitted by a limiting condition for operation.

- -- On January 16, 1981, for a period of approximately nine hours, the primary coolant leak detection systems sensitive to radioactivity were not in service. Operation in this condition is permitted by Technical Specification 3.1.5.3 for up to 48 hours without requiring further action.
- -- On February 13, 1981, during surveillance testing, the Pressurizer Level Transmitter (LT-428) output signal failed low due to a faulty channel amplifier. In accordance with Technical Specification 3.5.1, the number of channels to initiate a reactor trip remained in a one-out-of-two instrumentation logic until the failed amplifier was replaced.

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 twenty-five days of the date of this Notice, a written statement or explanation in reply including the corrective steps which have been taken and results achieved; corrective steps which will be taken to avoid further violations; and the date when full compliance will be achieved. Under the authority of Section 182 of the Atomic Energy Act of 1954, as amended, this response shall be submitted under oath or affirmation.

Date JUN 0 9 1981

Eldon J. Brunner, Chief, Projects Branch #1, Division of Residents and Project Inspection

Enclosure: Office of Inspection and Enforcement Inspection

Report Number 50-244/81-08

cc w/encls:

Central Records Specialist (3)

Harry H. Voigt, Esquire