

APPENDIX A

NOTICE OF DEVIATION

Rochester Gas and Electric Corporation
R. E. Ginna Nuclear Power Plant

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

As a result of the inspection conducted on May 5-8, 1987, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C) the following deviations were identified:

- A. I.E. Bulletin 79-02, Pipe Support Base Plate Design Using Expansion Anchor Bolts, revision 1 supplement 1 permitted continued plant operation given the following two conditions were satisfied:
- a. For the pipe support as a unit, the factor of safety compared to ultimate strength is equal to or greater than two.
 - b. For the anchor bolts the factor of safety is equal to or greater than two and for the support steel the original design factor of safety compared to ultimate strengths is met.

This supplement further specified that "Any support not satisfying the criteria should be classed as inoperable and the Technical Specification action statement met....."

Action Item 2 of the Bulletin 79-02 required that the licensee verify that the concrete anchor bolts have minimum factors of safety of 4.0 for wedge type anchors and 5.0 for shell type anchors. The licensee committed in the July 6, 1979 response to provide verification of the factor of safety for all Seismic Category I support anchor bolts.

Contrary to the licensee's commitment, the licensee did not have calculations to demonstrate the factors of safety for all supports subject to the Bulletin requirements.

- B. I. E. Bulletin 79-02, Action Item 4, requires that each anchor bolt used in piping system supports must be inspected unless it can be established that tension loads do not exist. The licensee's July 6 and December 7, 1979 responses to Bulletin 79-02 committed to reanalyze supports within the scope of the bulletin prior to initiation of inspection and testing.

Contrary to the licensee's commitment, the licensee records disclosed that seismic upgrade program modifications performed to some piping systems made it possible for some compression-only supports, that had load changes, to be subjected to tension loads. This situation exists in five



supports of a Seismic Category I system. At the time of this NRC inspection the licensee had not inspected the anchor bolts in these supports for proper installation, specified size and type.

Rochester Gas and Electric is hereby required to submit to this office within twenty days of the date of the letter which transmitted this Notice, a written statement or explanation in reply to the above deviations, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further deviations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending this response time.

