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 RUSSELL, W. Region 1, Office of Director

SUBJECT: Responds to NRC notice of violation in Insp Rept  
 50-244/87-09. Corrective actions: upgraded several previous  
 reviews w/plans to follow up on all active authorizations.

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July 29, 1987

U.S. Nuclear Regulatory Commission  
Region I  
Att: Mr. William Russell  
Regional Administrator  
631 Park Avenue  
King of Prussia, PA 19406

Subject: Inspection Report 50-244/87-09  
Notice of Violations  
R.E. Ginna Nuclear Power Plant  
Docket No. 50-244

Dear Mr. Russell:

Routine Inspection Report 50-244/87-09 Appendix A, stated in part:

During the inspection conducted on April 19, 1987 through May 30, 1987, and in accordance with the General Statement of Policy and Procedure for NRC Enforcement Actions 10 CFR Part 2, Appendix C (Enforcement Policy 1986), the following violation was identified:

Technical Specification 6.8.1 states that written procedures shall be established, implemented, and maintained covering activities referenced in Appendix A of Regulatory Guide 1.33, November 1972. Appendix A, paragraph I, "Procedures for Performing Maintenance", discusses control of maintenance and modification work.

Administrative Procedure A-1406.1, "Installation and Removal of Temporary Structural Features", Step 3.4.2, of A-1406.1 states that the Technical Manager or alternate shall document his review providing a determination whether the temporary installation will: 1) result in a change to the facility or its operation as described in the Safety Analysis Report, 2) provide a change to the Plant Technical Specifications, or 3) involve an unreviewed safety question.

Further, step 3.4.6 states that documentation of the review shall be attached to the authorization form, and the authorization form shall be forwarded to the Temporary Modification Coordinator for distribution.

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DATE July 29, 1987  
TO Mr. William Russell

Contrary to the above, as of May 21, 1987, Administrative Procedure A-1406.1 was not followed; in that, the required documented review was not attached to the following temporary structural features authorization forms:

1. From April 15, 1986 to October 9, 1986, scaffolding was installed in the Auxiliary Building over safeguards Bus 14.
2. From November 17, 1986 to December 19, 1986, scaffolding was installed in the control room above and around the main control board while at power.
3. From April 7, 1987 to May 8, 1987, scaffolding was installed in the Auxiliary Building over safeguards Bus 14.

Rochester Gas and Electric Corporation (RG&E) agrees with the violation in that justification for the determinations with respect to 1) changes to the facility or operation, 2) Plant Technical Specifications, or 3) an unreviewed safety question were not provided with the temporary modification authorization forms. The procedure cited directs the review to assess the proposed activity for the three criteria. It had been the intent that the signature by the Technical Manager or alternate met the requirement for compliance with the three criteria. RG&E does agree, however, that documentation in the form of a clear statement of the determinations and any conditions imposed as a basis for them should have been supplied to back up each conclusion. We also agree with the discussion in the details section of the Inspection Report of the difficulty in control of concurrent activities the omission caused.

The Temporary Modification Authorization Forms for the instances discussed in the Notice of Violation were accompanied by a review by the Technical Manager or alternate which consisted of a recognition of the other features in close proximity to the activity proposed and a list of conditions or requirements to be imposed. Without actually stating negative determinations in whether the temporary installation would 1) result in a change to the facility or its operation as described in the Safety Analysis Report, 2) provide a change to the Plant Technical Specifications, or 3) involve an unreviewed safety question, it was believed that observance of the requirements provided would be sufficient to allow such determinations.

**Corrective action taken and results achieved:**

Since discussion of this matter with the inspector, new temporary modification authorizations have been accompanied with specifically worded determinations as required by procedure A-1406.1 "Installation and Removal of Temporary Structural Features". Several of the previous reviews have also been upgraded in this way, with plans to follow up on all active authorizations.



DATE July 29, 1987  
TO Mr. William Russell

Existing temporary modifications are currently being formally presented to the MoPAR (Morning Priority Action Required) Committee via the plan-of-the-week schedule. In addition, selected proposed temporary modifications are verbally presented to MoPAR for their concurrence prior to implementation. This exchange of information when integrated with the maintenance and operational activities minimizes the potential of safety implications in regards to concurrent activities.

Corrective actions to be taken, in addition to completion of the above upgrade:

The series of procedures under A-1406 "Control of Temporary Modifications" will be reviewed and changes will be proposed to provide clearer direction on proper documentation of reviews. After a period of time for operation with the new procedural guidance, a Quality Assurance audit of the program for control of temporary modifications will be scheduled.

Dates when full compliance will be achieved:

Proposals to amend the series of procedures on control of temporary modifications are currently in progress with schedule for approval by September 1987. Upgrading of the review documentation for active authorizations will also be complete by September 1987.

Yours truly,

*Roger W. Kober*  
Roger W. Kober

RWK/lms

Subscribed and sworn to me  
on this 29<sup>th</sup> day of July  
Lynn I. Hauck

1987  
LYNN I. HAUCK  
Notary Public in the State of New York  
MONROE COUNTY  
Commission Expires Nov. 30, 1988

xc: U.S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, D.C. 20555

T. Pollich  
Ginna Resident Inspector

