ROCHESTER GAS AND ELECTRIC CORPORATION • 89 EAST AVENUE, ROCHESTER, N.Y. 14649-0001

January 15, 1988

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

Subject: Inspection Report 50-244/87-23
Notice of Violation
R. E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Russell:

Inspection Report 50-244/87-23 stated in part:

As a result of the inspection conducted on September 28 to October 2, 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:

> 10 CFR 50 Appendix B, Criterion XVI requires measures be established to assure that conditions adverse to quality, such as deficiencies are promptly identified and corrected.
>
> Ginna Station procedure A-1502 Nonconformance reports, Revision 10, Section 3.1.3 and Section 3.4.6 states "Nonconformances (deficiency in characteristics) pertaining to operating equipment or equipment in a standby mode available for operation shall be reported to Ginna Station Superintendent. The superintendent shall evaluate the safety impact of the nonconformance and determine the need and implement any further controls."
>
> Contrary to the above, on September 29, 1987 the fuse anomalies in Engineering work request 3341 and interoffice memorandum dated March 14, 1986 reported to the station superintendent, were not evaluated for their safety impact. As a result, these deficiencies were not corrected.

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RG&E agrees with the violation and offers the following in response to the Notice of Violation:

The fuse anomalies identified in the interoffice correspondence dated March 14, 1986 and May 28, 1986 from Corporate Engineering to the Station Superintendent were not evaluated on an individual basis for their safety impact. However, the information was reviewed by the plant staff and at the Plant Operations Review Committee (PORC) on June 4, 1986 for generic evaluation of the 125 volt DC distribution system to assure that the system performed as intended.

To outline our initial efforts toward fuse coordination, Ginna Station administrative procedure A-60, "Control of DC System Fuse Size and Coordination", was developed to provide direction for and control of installed fuses. A program was initiated to generate procedures and implement replacement of the identified fuse anomalies.

In addition, further engineering reviews were in progress under EWR-3341, DC System Evaluation, to ensure that specific design requirements were established. Implementation of the original fuse anomaly change outs was deferred until complete engineering design reviews were performed and an acceptable test program for qualification of fuses was established.

As a result of Inspection 87-23 and as stated in our October 21, 1987 letter, the DC fuse discrepancies were re-evaluated, and the documentation of the safety impact was expanded in the form of a Design Analysis. Each specific fuse anomaly was reviewed by the PORC on October 9 pursuant to 10CFR50.59. Based on the results of the detailed evaluation, the PORC concluded that the discrepancies identified in the Design Analysis did not involve an unreviewed safety question or require a change in the plant's Technical Specifications.

All originally identified anomalies which could be replaced with the plant at power without subjecting the plant or personnel to safety or operational challenges either as a result of replacement or as a result of post maintenance testing were resolved with the remaining items to be resolved by the end of the 1988 refueling outage.

The DC Fuse Upgrade Evaluation (EWR-3341) is continuing with a current scheduled completion date of January 1988. Higher priority replacements and upgrades, as a result of this evaluation, will be completed by the end of the 1988 refueling outage. We expect the remaining activities to be completed by the end of the 1989 refueling outage.

All DC fuses are now part of the configuration control program. Nonconformance Reports (NCR's) are now being utilized to document and disposition any DC anomalies not addressed in the Design Analysis as described above. This should assure that any future deficiencies will be promptly identified, evaluated, and dispositioned.

We have re-affirmed our policy on NCR's with the plant staff to ensure that any deficiencies pertaining to operating equipment be reported via an NCR to the Station Superintendent and that the Superintendent shall determine the need for and ensure implementation of additional controls on the non-conforming items and shall perform an evaluation of the safety impact in conjunction with controls on its use.

Full compliance has been achieved with completion of the safety evaluation and the review of our NCR policy with the plant staff.

Yours truly,

Bruce A. Snow

Subscribed and sworn to me on
this 15th day of January 1988

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

BAS/ams

xc: Ginna Resident Inspector
U.S. Nuclear Regulatory Commission (Original)
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NOW, B. A. Rochester Gas & Electric Corp.
RECIP. NAME RECIPIENT AFFILIATION
RUSSELL, W. Region 1, Ofc of the Director

SUBJECT: Responds to violations noted in Insp Rept 50-244/87-23. Corrective actions: nonconformance repts being utilized to document & disposition DC anomalies not addressed in design analysis to assure future deficiencies promptly identified.

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