#### 1 5 DEC 1988

Docket No. 50-244

Rochester Gas and Electric Corporation ATTN: Mr. Robert C. Mecredy General Manager Nuclear Production 49 East Avenue Rochester, New York 14649

#### Gentlemen:

Subject: Self Assessment Initiatives

Region I is aware that many licensees have implemented or are planning to conduct self-assessment programs to enhance their awareness of the effectiveness of activities that could affect safe plant operations. NRC fully supports such initiatives and is interested in factoring consideration of such programs into our inspection program planning for future SALP cycles.

To that end, I request that you provide the NRC, via the Senior Resident Inspector, your current schedule including dates and topics for self-assessment activities. Additionally, at future SALP management meetings, we request that you provide your best estimate for self assessment activities to be conducted in the next SALP period. In this way, we will better be able to schedule our inspection activities avoiding conflicts and making more productive use of available inspection resources.

This request does not constitute a regulatory requirement, but rather it is made in an attempt to enhance NRC's inspection process by giving appropriate consideration to licensee self-assessment initiatives.

Should you have any questions regarding this request, please feel free to contact either me or the responsible Region I DRP Branch or Section Chief' for your facility.

Thank you for your cooperation with us in this matter.

Sincerely,

Division of Reactor Projects

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IE40 - Systematic Assessment of Licensee Performance (SALP) Report

Docket: 05000244

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Dr. Robert C. Mecredy Vice President, Ginna Nuclear Operations Rochester Gas and Electric Corporation 89 East Avenue Rochester, New York 14649

SUBJECT: PLANT PERFORMANCE REVIEW - GINNA

Dear Mr. Mecredy:

The purpose of this letter is to communicate the NRC's assessment of Ginna performance and to inform you of our planned inspections at the facility. On February 24, 2000, we completed a Plant Performance Review (PPR) of Ginna Station. We conducted this review to develop an integrated overview of the safety performance of the plant. We used the results of the PPR in planning and allocating inspection resources and as an input to our senior management meeting (SMM) process. This PPR evaluated inspection results and safety performance information for the period from January 16, 1999, through January 31, 2000, but emphasized the last six months to ensure that our assessment reflected your current performance. Our previous summary of plant performance at Ginna was provided to you in a letter dated April 9, 1999.

The NRC has been developing a revised reactor oversight process that will replace our existing inspection and assessment processes, including the PPR, the SMM, and the Systematic Assessment of Licensee Performance (SALP). We recently completed a pilot program for the revised reactor oversight process at nine participating sites and are making necessary adjustments based on feedback and lessons learned. We plan to begin implementation of the revised reactor oversight process industry-wide on April 2, 2000.

This PPR reflects continued NRC process improvements as we make the transition into the revised reactor oversight process. The following summary of plant performance is organized differently from our previous performance summaries. Instead of characterizing our assessment results by SALP functional area, we organized the results into the strategic performance areas embodied in the revised reactor oversight process. In assessing your performance, we have considered the historical performance indicator data that you submitted in January 2000 in conjunction with our inspection results. The results of this PPR were used to establish the inspection plan in accordance with the new risk-informed inspection program (consisting of baseline and supplemental inspections). Although this letter incorporates some terms and concepts associated with the new oversight process, it does not reflect the much broader changes in inspection and assessment that will be evident after we have fully implemented our revised reactor oversight process.

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 During the last six months of the assessment period, Ginna operated at or near full power. We have not identified any significant performance issues in any of the strategic performance areas (reactor safety, radiation safety, and safeguards) during this assessment period and observed that Ginna continued to operate in a safe manner.

Ginna plant operators exhibited effective day-to-day operations of the unit and appropriate response to unplanned events. Plant operations were effectively supported by the maintenance and engineering department staffs. Human performance was improved and the corrective action program was adequately implemented. No significant performance issues were noted in the implementation of the emergency preparedness program. As a result, only normal baseline inspections are currently planned in the reactor safety strategic performance area.

We identified no significant performance issues in either the radiation safety or safeguards strategic performance areas. As a result, only normal baseline inspections are currently planned in these areas.

Enclosure 1 contains a historical listing of plant issues, referred to as the Plant Issues Matrix (PIM), that were used during this PPR process to arrive at our integrated view of your performance trends. The PIM for this assessment is grouped by the prior SALP functional areas of operations, maintenance, engineering, and plant support, although the future PIM will be organized along the cornerstones of safety as described in the revised reactor oversight process. The PIM includes items summarized from inspection reports or other docketed correspondence between the NRC and Rochester Gas and Electric Corporation regarding Ginna. We did not document all aspects of licensee programs and performance that may be functioning appropriately. Rather, we only documented issues that we believe warrant management attention or represent noteworthy aspects of performance. In addition, the PPR may also have considered some pre-decisional and draft material that does not appear in the attached PIM, including observations from events and inspections that had occurred since our last inspection report was issued, but had not yet received full review and consideration. We will make this material publically available as part of the normal issuance of our inspection reports and other correspondence.

Enclosure 2 lists our planned inspections for the period April 2000 through March 2001 at Ginna to allow you to resolve scheduling conflicts and personnel availability in advance of our inspector arrival onsite. Since many of the inspections at Ginna and at the other Region I facilities during this period involve a team of inspectors, our ability to reschedule inspections is limited. Therefore, we request you inform us as soon as possible of any scheduling conflicts. The inspection schedule for the latter half of the period is more tentative and may be adjusted in the future due to emerging performance issues at Ginna or other Region I facilities. Routine resident inspections are not listed due to their ongoing and continuous nature.



We will inform you of any changes to the inspection plan. If you have any questions, please contact me at (610) 337-5224.

Sincerely,

/RA/

Michele G. Evans, Chief Projects Branch 1 Division of Reactor Projects

Docket No. 05000244 License Nos. DPR-18

**Enclosures:** 

- 1. Plant Issues Matrix
- 2. Inspection Plan

Docket No. 05000244 License No. DPR-18

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#### Enclosure 1

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### United States Nuclear Regulatory Commission PLANT ISSUE MATRIX

Region I GINNA

Date	Source	Functional Area	ID	Туре	Template Codes	Item Title Item Description
01/23/2000	1999012	Pri: OPS	NRC	POS	Pri: 3A	Conduct of operations was professional and safety-conscious.
		Sec:			Sec:	In general, the conduct of operations was professional and safety-conscious. The cold weather inspection program was
Dockets Discussed: 05000244 Ginna		<del>.</del>		-	Ter:	effectively implemented to ensure systems, structures, and components important to the safe operation of the reactor plant were adequately protected from freezing. The weekly walkdown checklist, performed on January 9, 2000, effectively verified the required freeze protection measures were in place. The cold weather walkdown procedure was adequately written and provided clear guidance to the user (Sections O1.1 and O2.1).
01/23/2000	1999012	Pri: OPS	NRC	NEG	Prl: 3A	Testing of SI accumulator isolation valves not initially conservative.
Dockets Discu 05000244 Ginu		Sec: MAINT			Sec: Ter:	The change in philosophy pertaining to testing of the safety injection accumulator isolation valves quarterly vice in cold shutdown (resulting in at power testing) was not rigorously challenged within the organization. Though not prohibited, the decision to test the valves quarterly would have increased to a small extent the overall plant risk with no added safety benefit. The decision, rooted in a narrowly focused interpretation of the guidance contained in NUREG-1482, "Guidelines for Inservice Testing at Nuclear Power Plants," was subsequently reversed when challenged by the inspectors (Section O1.2).
01/23/2000	1999012	Pri: OPS	NRC	POS	Pri: 3A	Corrective actions to improve configuration controls and human performance have been effective.
		Sec: MAINT		-	Sec: 5C	The inspectors concluded that RG&E's corrective actions to prevent recurrence of configuration control and human
Dockets Discu 05000244 Gint			•		· Ter:	performance errors (inspector follow-up item 05000244/1997010-01) were adequate. Though not entirely successful in preventing re-occurrence, performance has improved and station management has continued to maintain improvement in human performance a priority (Section O8.1).
12/12/1999	1999011	Pri: OPS	, NRC	POS	Pri: 1A	System configuration and material condition was good.
		Sec:			Sec: 2A	The preferred and standby auxiliary feedwater (SAFW) systems were capable of performing their safety functions.
Dockets Discu 05000244 Ginu		-			Ter: 28	Overall material condition of the systems was good. However, RG&E personnel did not properly update an associated system alignment procedure to reflect current SAFW system configuration (Section O2.1).
12/12/1999	1999011	Pri: OPS	NRC	POS	Pri: 1A	Conduct of operations was professional and safety-conscious.
		Sec:			Sec: 3A	In general, the conduct of operations was professional and safety-conscious. Ginna's plant operations review
Dockets Discu 05000244 Gina					Ter:	committee thoroughly evaluated two emergent plant issues, and recommended sound corrective actions. The action report screening committee appropriately reviewed other plant issues that were documented through the corrective action program (Sections O1.1 and O7.1).
10/31/1999	1999009	Pri: OPS	NRC	POS	Pri: 1A	Operator response to a service water leak inside containment was good.
-		Sec:		,	Sec: 3A	Operators responded well to a service water leak inside containment and an unexpected loss of pressurizer proportion
Dockets Discu 05000244 Gina		А			Ter:	heaters. (O2.1 and M2.1)

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## United States Nuclear Regulatory Commission PLANT ISSUE MATRIX

Region I GINNA

Date	Source	Functional Area	ID	Туре	Template Codes	Item Title Item Description
10/31/1999	1999009	Pri: OPS	NRC	POS	Prl: 28	Effective training provided to licensed operators.
	Sec: 3000ckets Discussed: 5000244 Ginna 90/31/1999 1999009 Pri: OPS				Sec: 3A Ter:	Overall, RG&E personnel were effectively providing training for licensed operators and evaluating their performance. The licensed operator requalification training program met regulatory requirements with no significant weaknesses identified Program content was balanced and incorporated risk insights, and met the needs of the operators. Evaluations of simulator scenarios and job performance measures by the training department staff and operations department managers were objective and thorough. Training on plant specific and selected industry events was well prepared and presented. (O5.1)
10/31/1999	1999009	Pri: OPS	NRC	POS	Pri: 28	Nuclear Safety Audit and Review Board provided good insights to line management.
Dockets Discussed: 05000244 Ginna 09/19/1999 1999008		Sec:	٠		Sec: 3A Ter:	The Nuclear Safety Audit and Review Board convened in accordance with station guidelines, and its board members provided good insights to line management and sufficiently challenged the manner in which station activities were being performed. (O7.1)
09/19/1999	1999008	Pri: OPS	NRC	POS	Pri: 28	Good licensee response to Westinghouse tech bulletin on DB-50 breakers.
Dockets Discussed: 05000244 Ginna		Sec: ENG			Sec: Ter:	The licensee responded well to a Westinghouse technical bulletin indicating that DB-50 circuit breakers may fail to close, if required, during a seismic event. Placing this issue on the operator workaround list until modifications to the breakers were completed and expanding the review of potential breaker susceptibility to DB-25 and DB-75 breakers were good initiatives. (O2.1)
09/19/1999	1999008	Pri: OPS	NRC	POS	Pri: 1A	Adequate implementation of protective tagouts process.
Dockets Discu 05000244 Ginr		Sec: MAINT			Sec: 2B Ter:	The licensee adequately implemented the tagout processes and has taken proper action to enter longstanding tagouts into their corrective action program for resolution. A sample of tagouts inspected in the plant were determined to have been hung in accordance with the tagging requirements. The inspectors identified some minor administrative discrepancies with tagging documentation that were appropriately entered into the licensee's corrective action program for resolution. (O2.2)
08/08/1999	1999006	Pri: OPS	NRC	POS	Prl: 1A	Good plant staff response to the UE.
08/08/1999 1999006  Dockets Discussed: 05000244 Ginna		Sec:	-	÷	Sec: 2B Jer: 3A	The plant staff performed well in response to an Unusual Event declared after a small fire occurred while disassembling abandoned equipment in the auxiliary building. Poor work planning directly contributed to the event, in that, no potentia combustion concerns were identified or evaluated prior to this maintenance activity, even though a plasma arc (open flame) cutting tool was used.
08/08/1999	1999006	Pri: OPS	NRC	POS	Pri: 1C	Operator walkaround and challenge program effective.
Dockets Discu 05000244 Ginr		Sec:			Sec: 3A Ter:	Overall, the operator workaround and challenge program has been effective in identifying and resolving potential operational problems. The inspector identified two equipment deficiencies that had not been evaluated as operator workarounds, one of which was subsequently evaluated to be an operator challenge and properly dispositioned by the licensee.

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### United States Nuclear Regulatory Commission PLANT ISSUE MATRIX

Region I

Date	Source	Functional Area	1D	Type	Template Codes	Item Title
06/24/1999	- 1999005	Pri: OPS	NRC	NEG	Prl: 28	Root cause determinations generally satisfactory, but some reluctance to explore human performance aspect
		Sec:		0	Sec: 3A	RG&E's root cause determinations were generally satisfactory. Increased emphasis on improving the human
Dockets Disco 05000244 Gin			,	ž	Ter:	performance evaluation portion of the root cause determination was noted. However, the effectiveness of this effort was not yet apparent, as plant events directly attributed to personnel error continued to occur. In addition, weaknesses in licensee evaluation of an excessive overtime issue were observed. The team also noted several examples of problems, not specifically related to human performance issues, which were not fully analyzed or evaluated during the root cause determination process to fully assess all contributing factors. (Section O7.3)
06/24/1999	1999005	Pri: OPS	NRC	POS	Pri: 28	Adequate Corrective Action Program.
		Sec:			Sec:	Through the corrective action program, RG&E identified problems at a low threshold, and appropriately prioritized the
Dockets Disco 05000244 Gin				e e	Ter:	resulting action requests. Root cause evaluations and development of corrective actions were performed adequately. Management awareness of and involvement in the corrective action process was well evident. Feedback mechanisms used to assess corrective action effectiveness were adequate. Corrective actions were developed and implemented in a timely manner. Although a formal problem trending process did not exist, efforts for improvement were noted. The corrective action program was determined to be satisfactory overall. (Section O7.1)
06/24/1999	1999005	Pri: OPS	NRC	POS ,	Pri: 28	Satisfactory threshold for problem identification and resolution.
		Sec:			Sec: 3A	The Ginna Action Report (AR) program for problem identification and documentation and the Work Request/Trouble
Dockets Discussed: 05000244 Ginna					Ter:	Report system were used satisfactorily to document plant deficiencies/issues. The established threshold for issuing an AR was found to be appropriate, and it was apparent that management had effectively communicated their expectations to the staff concerning the use of the AR system. (Section O7.2)
06/27/1999	1999004	Pri: OPS	NRC	NEG	Pri: 28	Operations personnel responded well to an unanticipated rod withdrawal, but the work package preparation
Dockets Disco 05000244 Gin		Sec: MAINT		π ,	Sec: 3A Ter:	Operations personnel responded well to an unanticipated automatic withdrawal of control rods during maintenance on the nuclear instrument current comparator drawer N-38. Work package preparation and review for this work activity was poor, as it did not anticipate the need for control rods to be placed in manual. Additionally, Instrumentation and Control technicians exhibited a knowledge weakness by indicating that the comparator drawer work would not impact control rod motion. (O4.1)
07/22/1999	1998-003-02	Pri: OPS	Licensee	LER	Pri: 5A	ACTUATIONS OF CONTROL ROOM EMERGENCY AIR TREATMENT SYSTEM DUE TO INVALID CAUSES
		Sec: ENG			Sec: 5C	LER 1998-003, revision 2, adequately described the licensee's response and analysis of invalid control room emergency
Dockets Disco 05000244 Gin					Ter:	air treatment system actuations. The plan to replace the control room radiation monitoring system with more reliable equipment was an appropriate resolution to a longstanding problem.
05/16/1999	1999003	Pri: OPS	NRC	NEG	Pri: 1A	Human performance error caused April 23 automatic shutdown.
•		Sec:			Sec: 3A	A human performance error resulted in an automatic reactor shutdown from 35% power on April 23, 1999. The licensee
Dockets Disco 05000244 Gin					Ter:	effectively evaluated the trip for its principle root causes prior to unit restart. An event investigation was appropriately initiated to examine additional human performance issues related to the event. (O2.2) Reference LER 99-07 and LER 99-07, suppl 01, reviewed and closed in IR 99-08, section O8.2

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#### United States Nuclear Regulatory Commission PLANT ISSUE MATRIX

Region I GINNA

Date	Source	Functional Area	1D	Туре	Template Codes	Item Title Item Description
05/16/1999	1999003	Pri: OPS	NRC	POS	Pri: 1A	Effective identification and resolution of failed RPS bistable (caused April 27, 1999 scram).
Dockets Disco 05000244 Gin		Sec: MAINT			Sec: Ter:	The licensee effectively identified and corrected a failed reactor protection system bistable which resulted in an automatic reactor shutdown on April 27, 1999. Operator response to this plant transient was good. (O2.3) Referenc LER 99-08, reviewed and closed in IR 99-08, section O8.3.
05/21/1999	1999-006-00	Pri: OPS	Licensee	LER	Pri:	VALVE IN UNEXPECTED POSITION RESULTS IN START OF TURBINE-DRIVEN AUXILIARY FEEDWATER PUMI
Dockets Discussed: 05000244 Ginna 04/04/1999 1999002	Sec: MAINT		-	Sec: Ter:	Inadevertant start of TDAFWP was a self-revealing event caused by an inadequate test procedure and poor communications betweeen personnel involved with the test. Reference IR 99-08, section O8.1.	
04/04/1999	1999002	Pri: OPS	NRC	POS	Pri: 1A	Operators respond well.
Dockets Discussed: 05000244 Ginna		Sec:			Sec: Ter:	Control room operators responded well to anomalous plant conditions and performed well in controlling the plant durin the shutdown and cooldown for a scheduled refueling outage.
04/04/1999	1999002	Pri: OPS	NRC	NEG	Pri: 1C	Progress made in system configuration control, but problems continued.
Dockets Disco 05000244 Gind		Sec: MAINT			Sec: 2A Ter:	The licensee made progress in improving system configuration controls, and the training conducted for licensed operators on past configuration control problems was a good initiative. However, several configuration control deficiencies occurred during the current refueling outage which indicate ongoing problems still existed in this area. The new issues were entered into the licensee's corrective action program.
03/29/1999	1999-002-00	Pri: OPS	Licensee	LER	Pri:	SURVEILLANCE NOT PERFORMED, DUE TO PERSONNEL ERROR, RESULTED IN VIOLATION OF TS
Dockets Discu 05000244 Gin		Sec:			Sec: Ter:	Licensee identified surveillance oversight, caused by operator error. TS surveillance violation not subject to formal enforcement action. Reference IR 99-02 Section O8.1.
02/21/1999	1999001	Pri: OPS	NRC	POS	Pri: 1A	New fuel receipt inspection
Dockets Disco		Sec:		-	Sec: 3A <sup>*</sup> Ter:	Receipt inspection of new fuel was thorough and well controlled. No notable discrepancies were noted on any of the fuel assemblies or in the licensee's documentation.

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### United States Nuclear Regulatory Commission PLANT ISSUE MATRIX

Region I

Date	Source	Functional Area	ID	Туре	Template Codes	Item Title Item Description
02/21/1999	1999001	Pri: OPS	· NRC	POS	Pri: 18	Operator performance during planned transients
Dockets Disco 05000244 Gin		Sec:			Sec: Ter:	Operator performance during planned offsite electrical distribution system reconfigurations and normal down-power operations throughout the inspection period was good.
02/21/1999	1999001-01	Pri: OPS	NRC	NCV	Pri: 1C	Ineffective corrective action led to inadvertant dilution event.
		Sec: MAINT			Sec: 5A	Several operational events occurred due in part to ineffective coordination and communication between operations and
Dockets Discussed: 05000244 Ginna					Ter: 5C	other organizations that were previously unidentified, and therefore not corrected, and which contributed to a reactor coolant system dilution event. Additionally, the dilution event investigation did not meet administrative requirements for timeliness, thoroughness, or sequestering of investigation personnel which contributed to inaccuracies in the investigation and the lack of an exact root cause. However, the licensee initiated corrective actions to address deficiencies in the investigation, and in coordination and communications between operations and other departments.
01/23/2000	1999012	Pri: MAINT	NRC	POS	Pri: 1A	Appropriate performance of maintenance and surveillance testing.
	*	Sec: OPS			Sec:	Personnel effectively performed the observed maintenance and surveillance activities in accordance with approved
ockets Discussed:					Ter:	procedures. Emergent maintenance activities associated with an instrument air leak on a main feedwater regulating valve positioner were adequately evaluated and properly executed (Sections M1.1 and M2.1).
05000244 Gini	na	-			-	Conduct of surveillance procedure PT-16Q-T, "Auxiliary Feedwater Turbine Pump Operability," was well coordinated, properly controlled, and adequately demonstrated the ability of the turbine driven auxiliary feedwater pump to provide feedwater to the steam generators. However, the inspectors noted that the test sequence did not perform the stroke time test of the turbine steam admission valves in the as-found condition with no pre-test stroking as required by IP-IIT-2, "Inservice Testing Program for Pumps and Valves," (Section M1.2).
11/23/1999	1999012-01	Pri: MAINT	NRC	NCV	Pri:	OPENING CONTROL ROOM VENTILATION SYSTEM FOR FILTER REPLACEMENT RESULTED IN PLANT BEING
Dockets Discu 05000244 Gini		Sec: ENG			Sec: Ter:	Maintenance activities on the control room ventilation system placed the plant outside its design basis during numerous occasions partially because system design information was not properly incorporated into maintenance procedures. This violation of NRC requirements was non-cited. Additionally, the root cause analysis presented in the associated licensee event report was narrowly focused since it did not address potential human performance deficiencies. RG&E's immediate and planned corrective actions were adequate (Section M8.1).
12/12/1999	1999011	Pri: MAINT	NRC	POS	Pri: 2B	Licensee personnel effectively performed selected maintenance and testing activities.
		Sec:			Sec: 3A	RG&E personnel effectively performed selected maintenance and surveillance activities in accordance with approved
Dockets Discussed: 05000244 Ginna	*		•	Ter:	procedures and station requirements (Section M1.1).	
12/12/1999	1999011	Pri: MAINT	NRC	POS	Pri: 28	Corrective maintenance on the control room vent system was adequate.
		Sec:	C		Sec: 3A	Immediate and planned corrective actions for a previously identified deficiency in the control room ventilation system
Dockets Disci 05000244 Gin		•			Ter:	were adequate (Section M8.1).

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## United States Nuclear Regulatory Commission PLANT ISSUE MATRIX

Region i

	_	Functional			Template	
Date	Source	Area -	ID	Туре	Codes	Item Description · •
10/31/1999	1999009	Pri: MAINT	NRC'	POS	Pri: 2A	Maintenance staff effectively repaired recirc fan cooler and pressurizer heater problem.
•		Sec:			Sec: 3A	Maintenance personnel effectively repaired a leaking containment recirculation fan cooler, and a faulty pressurizer
Oockets Discu					Ter:	heater control cabinet. (O2.1 and M2.1)
05000244 Ginr	na					
09/19/1999	1999008	Pri: MAINT	NRC	POS	Pri: 1A	Observed maintenance and surveillance activities appropriately performed.
3.		Sec: OPS			Sec: 2B	Observed maintenance activities were accomplished in accordance with procedural requirements. The licensee's
Dockets Discu		-			Ter: 3A	post-maintenance testing was adequate to demonstrate the operability of equipment prior to its return to service. Test procedures contained adequate details for accomplishing test requirements. Testing was performed by knowledgeable
05000244 Gint	na					personnel, and test instrumentation was properly calibrated. (M1.1)
09/19/1999	1999008	Pri: MAINT	NRC	POS *	Pri: 3A	Effective identification and resolution of CR ventilation problem.
		Sec: OPS			Sec: 2A	The licensee effectively identified a deficiency in a flexible suction joint for the control room ventilation system air intake
	ckets Discussed:			Ter:	fan. The temporary modification performed on the system adequately corrected the deficiency and was completed in a	
05000244 Gini	na		•			timely manner. (M2.1)
09/19/1999	1999008-01	Pri: MAINT	NRC	NCV	Pri: 1A	BREACH OF OVERTIME REQUIREMENTS FOR ON-SITE PERSONNEL
_		Sec: OPS			Sec: 2B	The licensee's control of maintenance worker overtime authorization and use during the March 1999 refuel outage was
Dockets Discu 05000244 Gini			•		Ter:	poor, as demonstrated by the failure of a lead technician to obtain prior written approval, as required by station procedure. The licensee entered this issue into their corrective action program for resolution and committed to improve the effectiveness and implementation of existing overtime guidance. This failure to follow station procedures was treated as a non-cited violation. (M7.1)
08/06/1999	1999007	Pri: MAINT	NRC	POS	Pri: 2B	Failure rate of low-voltage breakers at Ginna higher than the industry failure rate, PMs improved.
		Sec: ENG			Sec: 3A	The failure rate of the low-voltage circuit breakers at Ginna was higher than the generic industry failure rate due to
Dockets Discu 05000244 Gini					Ter:	previous inadequate root cause analyses and corrective actions to address the repeated breaker failures. The licensee recognized these breaker issues and had established reasonable goals to improve breaker performance. The preventive maintenance procedures were improved. The material condition of the breakers was good.
08/06/1999	1999007	Pri: MAINT	NRC	POS	Prl: 28	PM program on low voltage DB series circuit breakers improved.
		Sec: ENG			Sec: 4C	The preventive maintenance program procedures for low voltage DB series circuit breakers had been improved and were
Dockets Discu 05000244 Gini					Ter:	found satisfactory. The licensee had made good progress in the breaker preventive maintenance activities, and had developed an appropriate plan for future breaker maintenance.

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## United States Nuclear Regulatory Commission PLANT ISSUE MATRIX

Region I GINNA

Date	Source	Functional Area	ID	Туре	Template Codes	Item Title Item Description
08/06/1999	1999007	Pri: MAINT	NRC	POS	Prl: 5A	Extensive troubleshooting, root cause evaluations, and corrective actions appropriate.
	*	Sec: ENG			Sec: 5B	The licensee completed extensive troubleshooting for the recent circuit breaker failures. The corrective actions taken
Dockets Discu			•		Ter: 5C	and the root cause evaluations completed for the breaker failures were appropriate.
05000244 Ginr	na					• •
08/08/1999	1999006	Pri: MAINT	NRC	POS	Pri: 28	Maintenance and surveillance activities were appropriately conducted.
		Sec:			Sec: 3A	Observed maintenance and surveillance activities were accomplished in accordance with procedural requirements. The
Dockets Discu 05000244 Ginr					Ter:	post-maintenance testing was adequate to demonstrate the operability of equipment prior to its return to service. Test procedures contained adequate details for accomplishing test requirements. Testing was performed by knowledgeable personnel, and test instrumentation was properly calibrated. Good troubleshooting and corrective actions were taken in response to a writing problem identified during reactor trip breaker testing.
08/08/1999	1999006	Pri: MAINT	NRC	POS	Pri: 28	Maintenance rule expert panel critical of plant systems performance.
		Sec:			Sec: 3A	Members of the maintenance rule expert panel were open in their discussions, exhibited good participation, and
Dockets Discu		_			Ter:	provided critical evaluations and oversight of plant systems performance.
05000244 Ginr	na		C.			
06/27/1999	1999004	Pri: MAINT	NRC	POS	Pri: 1C	Conduct of maintenance activities was good.
		Sec:			Sec: 3A	Observed maintenance activities were accomplished in accordance with procedural requirements. The licensee's post
Dockets Discu 05000244 Ginr		•			Ter:	maintenance testing was adequate to demonstrate the operability of equipment prior to it's return to service. Test procedures contained adequate details for accomplishing test requirements. Testing was performed by knowledgeable personnel, and test instrumentation was properly calibrated. (M1.1)
06/27/1999	1999004	Pri: MAINT	NRC	POS	Pri: 2A	Good staff response to A EDG output breaker failure.
		Sec: ENG			Sec: 4C	The licensee took proper actions following discovery of the failed A-emergency diesel generator output breaker to
Dockets Discu 05000244 Ginr					Ter: 5C	troubleshoot, identify, and correct the breaker failure mechanism. The licensee's broader corrective actions to review a breaker maintenance procedures for adequacy with the vendor was considered a good initiative. (M2.2)
06/27/1999	1999004	Pri: MAINT	NRC	NEG	Pri: 28	Circuit 767 cable replacement went well, but the potential adverse work activity coordination was poor.
		Sec: OPS			Sec: 3A	Offsite power circuit 767 cable replacement was successfully performed in a timely manner. However, the licensee
Dockets Discu 05000244 Ginr				٠	Ter:	demonstrated poor work coordination when activities outside the protected area, which could adversely impact the availability of the in-service offsite power circuit, were not suspended until after work on circuit 767 was commenced an after being brought to the licensee's attention by the inspectors. (M2.1)

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By Primary Functional Area / Issue Date

Region I

* Date	Source	Functional Area	ID	Туре	Template Codes	Item Title Item Description
07/15/1999	1999-010-00	Pri: MAINT	Self	LER	Pri:	RADIATION MONITOR ALARM, DUE TO HIGHER THAN NORMAL RADIOACTIVE GAS CONCENTRATION, RESUL
		Sec: ENG			Sec:	High radiation alarm due to actual condition, however, the licensee identified that the alarm setpoint was overly
Dockets Discu	ıssed:				Ter:	conservative. Reference IR 99-08, seciton O8.4.
05000244 Gin	na	•				
05/16/1999	1999003	Pri: MAINT	NRC	POS	Pri: 1C	Maintenance and Surveillance observations all positive.
		Sec:			Sec: 3A	Observed maintenance and surveillance activities were accomplished in accordance with procedure requirements,
Dockets Discu 05000244 Gin					Ter:	except for missing signatures in the procedure used to replace the delta temperature math module. That incident was properly entered into the licensee's corrective action system for resolution. The licensee's post-maintenance testing was adequate to demonstrate the operability of equipment prior to its return to service. (M1.1)
05/16/1999	1999003	Pri: MAINT	NRC	NEG	Pri: 1C	Sucessful RTD replacement, but poor PORC oversight to ensure root cause id'd.
		Sec: OPS			Sec: 3A	The licensee successfully replaced failed resistance temperature detectors (RTDs) in the reactor coolant system, and
	ockets Discussed: 5000244 Ginna		Ter:	operations personnel performed well in conducting a controlled drain-down and reful of the reactor coolant system to accommodate the replacement. The Plant Operations Review Committee's initial recommendation to close the RTD leakage ACTION Report (99-0751) without completing a root cause determination was an example of ineffective corrective action. (M2.2)		
04/04/1999	1999002	Pri: MAINT	NRC	POS	Prl: 1C	Systematic work practices and good quality repairs.
4		Sec:			Sec:	The licensee exercised systematic work practices and achieved good quality repairs during preventive maintenance
Dockets Disco 05000244 Gin					Ter:	inspections of plant equipment and circuit breakers. Controlled procedures were in use at maintenance job sites, were up to date and were properly utilized by technicians involved in the outage work. The inspectors observed good personnel and plant safety practices during the maintenance work. A lower threshold for operability considerations during breaker maintenance had improved licensee identification and resolution of breaker problems.
04/04/1999	1999002	Pri: MAINT	NRC	POS	Pri: 1C	Significant programmatic improvement in the area of FME.
•		Sec:			Sec: 3A	The licensee made significant programmatic improvements in foreign material exclusion (FME) controls, and took
Dockets Disc 05000244 Gin	ckets Discussed:				Ter:	actions to formally incorporate previous weaknesses into their corrective action process. During the current refueling outage, the licensee was able to identify causes for all of the FME incidents that had occurred to date, initiated corrective actions to recover the material, and implemented additional controls to prevent further occurrences.
04/04/1999	1999002	Pri: MAINT	NRC	POS	Pri: 1C	Good system testing activity conduct.
		Sec: ENG			Sec: 3A	Test activities involving safety injection accumulator check valves, emergency diesel generators, and the residual heat
Dockets Disc 05000244 Gin					Ter:	removal system were well controlled, and the systems were satisfactorily tested to assure operability prior to being returned to service.

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Date	Source	Functional Area	ID	Туре	Template Codes	Item Title Item Description
04/04/1999	1999002	Pri: MAINT	NRC	POS -	Pri: 1C	ISI activities well planned and implemented.
Dockets Discu 05000244 Ginu		Sec: ENG			Sec: 3A Ter:	Inservice inspection (ISI) activities were well planned and implemented by qualified personnel in accordance with approved procedures. Inspector observation of nondestructive testing in progress showed that the ISI work was conducted with proper oversight by RG&E staff and the results were well documented. The inspections observed were thorough and of sufficient extent to determine the integrity of the components inspected. Problems were evaluated and effectively addressed in accordance with Code requirements.
05/13/1999	1999-005-00	Pri: MAINT	Licensee	LER	Pri:	UNDERVOLTAGE SIGNAL ON SAFEGUARDS BUS DURING TESTING RESULTS IN AUTOMATIC START OF "B" EF
	Dockets Discussed: 05000244 Ginna		*		Sec: Ter:	Self identifying event resulting from a cognitive personnel error during testing. Reference IR 99-03, section O8.3.
05/12/1999	-1999-004-00	Pri: MAINT Sec: ENG	Licensee	LER	Pri:	CONTAINMENT RECICULATION FAN MOISTURE SEPARATOR VANES INCORRECTLY INSTALLED RESULTS IN U
	Dockets Discussed: 05000244 Ginna				Sec: Ter:	Licensee identified problem caused by manufacturing error. Reference IR 99-03, section O8.2.
02/21/1999	1999001	Pri: MAINT	NRC	POS	Pri: 1C	Maintenance rule expert panel
Dockets Discu 05000244 Gin		Sec:			Sec: Ter:	Individuals on the maintenance rule expert panel asked probing questions and demonstrated a good understanding of the maintenance rule. However, no regular schedule existed for expert panel meetings, which resulted in a backlog of maintenance rule items for review.
02/21/1999	1999001	Pri: MAINT	NRC	POS	Pri: 2B	Maintenance backlog reduced
Dockets Discu 05000244 Gina		Sec:			Sec: 2A Ter:	The circuit breaker maintenance program for the low-voltage circuit breakers was significantly improved, and the corrective actions taken to address the recurring breaker failures were effective. The root cause analyses performed to address the breaker failures were comprehensive. Revised maintenance procedures were clear, and detailed. The licensee's recent practice of using reduced-control-voltage testing was good and provided a better verification of breaker condition during maintenance.
02/21/1999	1999001	Pri: MAINT	NRC	POS	Pri: 3A	Maintenance and surveillance work
Dockets Discu 05000244 Gin		Sec:			Sec: 2B Ter:	Controlled procedures were used at job sites. The procedures were up to date and were properly used by technicians involved in maintenance and surveillance work. The inspectors observed good personnel and plant safety practices. Equipment tested met the acceptance criteria specified for operability. The acceptance criteria bases reviewed were adequate.

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Date	Source	Functional Area	ID	Туре	Template Codes	Item Title Item Description
02/21/1999	1999001	Pri: MAINT	NRC	POS	Pri: 3A	Offsite power cable replacement -
Dockets Discu 05000244 Ginr		Sec:			Sec: 28 Ter:	The cable replacement for offsite power circuit 751 was successfully performed in a timely manner. However, the licensee's analysis to determine the effect on the performance of safety functions during this activity was deficient in that no overall change in core damage frequency was identified.
02/21/1999	1999001	Pri: MAINT	NRC	POS	Pri: 3A	Plant scaffolds
Dockets Discu 05000244 Ginr		Sec:			Sec: 3B	Plant scaffolds appeared to be well designed and constructed in accordance with procedural requirements. However some confusion among the maintenance staff appeared to exist regarding the need for seismic scaffolding in areas of the turbine building near high energy piping.
02/21/1999	1999001	Pri: MAINT	NRC	POS	Pri: 5A	A EDG synchronization selector switch deficiency identification
Dockets Discu 05000244 Ginr	-	Sec:			Sec: 58 Ter:	The licensee effectively identified a deficiency in the synchronization selector switch for the A-emergency diesel generator. Sending the replaced switch to a materials laboratory for analysis was a good initiative.
01/23/2000	1999012	Pri: ENG	NRC	POS	Prl: 48	RGE response to GL 98-02 was acceptable.
Dockets Discu 05000244 Ginn	ssed:	Sec:	NAC	F03	Sec: Ter:	RG&E determined that Ginna station was vulnerable to an event referenced in generic letter (GL) 98-02, "Loss of Reactor Coolant Inventory and Associated Loss of Emergency Mitigation Functions While in a Shutdown Condition," and took acceptable corrective actions. RG&E's response to GL 98-02 was timely and complete (Section E2.1).
12/12/1999	1999011	Pri: ENG	NRC	POS	Pri: 48	Engineering staff appropriately developed and evaluated a mod to the control room envelope.
	2/12/1999 1999011 Pockets Discussed: 15000244 Ginna	Sec:			Sec: 4C Ter:	Engineering department personnel appropriately developed and evaluated a modification to the control room envelope (Section E2.1).
10/31/1999	1999009	Pri: ENG	NRC	POS	,Pri: 4A	Engineering personnel maintained proper controls over a plant modification.
Dockets Discu		Sec:			Sec: 48 Ter: 4C	RG&E engineering personnel maintained proper controls over a permanent plant modification throughout the development, implementation, and testing stages. Maintenance activities associated with the modification were well coordinated. (E2.1)

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Region I

Date	Source	Functional Area	ID	Туре	Template Codes	Item Title Item Description
09/19/1999	1999008	Pri: ENG	NRC	POS	Pri: 3A	Effective Identification and resolution of missing baseplate bolt.
		Sec: MAINT	MAC		Sec: 4B	The licensee effectively identified and corrected a deficiency with the B-residual heat removal pump after discovering
Dockets Discus	sed:	CCC. IVAIRT		,	Ter: 5A	one baseplate floor bolt missing. The engineering analysis performed adequately verified pump operability. (E2.1)
05000244 Ginna	1		-		1011.324	
09/22/1999	1999-011-00	Pri: ENG	Licensee	LER	Pri: 4A	SMALL BREACH IN VENTILATION SYSTEM RESULTS IN PLANT BEING OUTSIDE DESIGN BASIS
	•	Sec: MAINT			Sec: 4B	RG&E determined the most likely cause of the event was a heavy load being placed on the flexible duct work.
Dockets Discus 05000244 Ginna					Ter:	Additional corrective actions include a detailed examination of the damaged duct work following replacement during the next refueling outage. RG&E's immediate and planned corrective actions were adequate. Closed in IR 99-11.
08/06/1999	1999007	Prl: ENG	NRC	POS	Prl: 3A	Engineering staff effective in identifying and resolving technical issues.
	•	Sec:			Sec: 4B	Engineering had been effective in identifying and property resolving technical issues. In addition, the design contro
Dockets Discussed: 05000244 Ginna			-	-	Ter:	temporary modification, and corrective action procedures provided appropriate guidance for identification and resolution of technical issues.
08/06/1999	1999007	Pri: ENG	NRC	POS	Pri: 3A	Engineering backlog effectively managed.
		Sec:			Sec: 4B	Engineering backlogs were being managed effectively. The new work planning and tracking program being implemente
Dockets Discus 05000244 Ginna					Ter:	was an enhancement for engineering workload management.
08/06/1999	1999007	Pri: ENG	NRC	POS	Pri: 3A	Self-assessments had meaningful findings and results.
		Sec:			Sec: 5A	The self-assessment performed by Ginna personnel in the area of records management produced meaningful findings
Dockets Discussed: 05000244 Ginna		•			Ter: 5B	for improvement. The independent assessments performed by outside contract organizations contributed significant findings regarding specific technical areas. The assessments were in-depth and of high technical quality, and were conducted using developed plans, with corrective actions initiated on all findings and recommendations. Overall, the licensee had a good self assessment program.
08/06/1999	1999007	Pri: ENG	NRC	POS	Pri: 4A	Design data for systems and associated modifications were consistent with license basis.
		Sec:			Sec: 4C	The design data for the systems and components and for the design change modifications were consistent with the
Dockets Discussed: 05000244 Ginna					Ter:	Ginna licensing and design bases as specified in the technical specifications, and the UFSAR. The design data for the design change modifications were controlled, documented and incorporated into the appropriate design documents.

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Region I

Date	Source	Functional Area	ID	Туре	Template Codes	Item Title Item Description		
08/06/1999	1999007	Pri: ENG	NRC	POS	Pri: 48	TMs were properly prepared and documented.		
		Sec:			Sec: 4C	The temporary modifications were properly prepared and documented in accordance with the station procedures. The		
Dockets Discu 05000244 Ginn					Ter:	evaluation, installation, post-modification test requirements and safety reviews provided by engineering presented adequate technical basis for the modifications. There were no longstanding temporary modifications at Ginna.		
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08/06/1999	1999007	Pri: ENG	NRC	POS	Pri: 4B	Safety evaluations well written.		
		Sec:			Sec: 4C	Safety evaluation/review procedures were well-written documents that provided adequate guidance to determine if a		
Dockets Discu 05000244 Ginn			1		Ter:	proposed activity could be implemented without prior NRC approval. With some minor exceptions, the completed safety evaluations were comprehensive and thorough. The safety evaluation training provided to technical personnel was good. The plant operation review committee's review of a safety evaluation was also good. Process controls were in place to ensure changes to the plant were reflected in design documents.		
08/06/1999	1999007	Pri: ENG	NRC	POS	Pri: 4C	Plant change process procedures good.		
Dockets Discussed: 05000244 Ginna		Sec:			Sec:	The plant change process procedures provided appropriate guidance to the engineers for dissemination of design		
					Ter:	information. The implementation of the modification-follow-meetings and the system engineering group had resulted in improved communication of engineering information to other departments at the site.		
08/06/1999	1999007	Pri: ENG	NRC	POS	Pri: 5A	QA audits thorough in the engineering area.		
		Sec:	,		Sec: 4C	The quality assurance audits were thorough and in-depth, and resulted in good findings regarding engineering and		
O5000244 Ginn					Ter:	rocurement activities. The licensee adequately addressed the audit findings.		
08/06/1999	1999007-01	Pri: ENG	NRC	NCV	Pri: 48	Incorrect input for MOV weak link analysis.		
		Sec:		-	Sec: 4C	Design change modifications were properly designed and implemented. Affected documents were appropriately		
Dockets Discussed: 05000Ž44 Ginna			bases to demonstrat documents were wel setpoint changes we NRC, one involved a		Ter:	updated to capture and preserve the changes in the design basis documents. The safety evaluations provided sufficien bases to demonstrate that no unreviewed safety questions were involved in the modifications. The design change documents were well written and thorough. Supporting calculations generally presented good technical bases. The setpoint changes were adequately evaluated and properly implemented. However, two NCVs were identified by the NRC, one involved an incorrect design input to an motor operated valve weak link analysis, while the other involved not promptly implementing setpoint changes.		
08/06/1999	1999007-02	Pri: ENG	NRC	NCV	Pri: 48	Untimely corrective actions for instrument setpoint changes.		
		Sec:			Sec: 4C	(Same as NCV 50-244/99-07-01 text.)		
Dockets Discu					Ter: 5C			

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Region I

Date	Source	Functional Area	ID	Type	Template Codes	Item Title Item Description
08/06/1999	1999007-03	Pri: ENG	NRC	NCV	Pri: 5A	Auxiliary building post-accident environment.
Dockets Disc	ussed:	Sec:	-		Sec: 5C Ter:	The original auxiliary building post-accident environment calculation used non-conservative assumptions and was a non-cited violation (NCV) of 10 CFR 50, Appendix B, Criterion III, Design Control, which requires measures to provide for
05000244 Gin	na					verifying and checking the adequacy of the design. (Section E8.1)
08/06/1999	1999007-04	Pri: ENG	Licensee	NCV	Pri: 48	Steamline break mass and energy release analysis.
		Sec:			Sec: 4C	The failure to establish appropriate administrative controls over the supply of design inputs to vendors was a NCV of
Dockets Disce 05000244 Gin					Ter:	design control requirements contained in 10CFR 50, Appendix B, Criterion III. The licensee's immediate and long term corrective actions were comprehensive and were either completed or appropriately scheduled for completion in a reasonable time. (Section E8.5) Reference LER 99-01 and LER 99-01, suppl 01; IR 99-02, section E8.2; and IR 99-03, section E8.2.
08/08/1999	1999006	Pri: ENG	NRC	POS	Pri: 48	Engineering staff response to algae intrusion was good.
Dockets Discussed: 05000244 Ginna		Sec:			Sec:	Engineering personnel performed well in response to an algae intrusion of the service water system. The analysis
			-		Ter:	performed for delta pressure limits on the emergency diesel generator (EDG) Jacket water and lube oil coolers provided enhanced guidance to operations personnel for determining EDG operability.
06/24/1999	1999005	Pri: ENG	NRC	NEG	Pri: 48	Main steam non-return check valve calcs not conservative.
=		Sec:			Sec: 4C	The assumptions, analytical methods, and calculations used by the licensee to declare the main steam non-return
Dockets Discr 05000244 Gin					Ter:	check valves operable may not be conservative and may not be applicable in all cases. The licensee did not show that the uncertainty in the calculation is less than the available margin of torque needed to close the valve. Therefore, operability of the main steam non-return check valves remains an open issue pending NRC review of additional information from RG&E. (Section E7.1)
06/24/1999	1999005	Pri: ENG	NRC	POS	Pri: 4B	Operability determinations were generally acceptable.
ŕ		Sec:			Sec: 3A	In general, the operability determinations reviewed were acceptable. A few of the operability determinations reached ar
Dockets Discussed: 05000244 Ginna					Ter:	appropriate conclusion, but were not thoroughly documented. One operability determination, regarding the main steam non-return check valves was inadequate. (Section E7.1)
06/24/1999	1999005	Pri: ENG	NRC	POS	Pri: 28	Peer assisted self assessments were good.
		Sec: MAINT			Sec: 3A	The team concluded that the peer-assisted self-assessments were good; they included a strong independent
Dockets Disci					Ter:	perspective and numerous findings for improvement. Corrective actions and program enhancements resulted from the assessments. (Section E7.4

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NNA						
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06/24/1999	1999005-01	Pri: ENG	NRC	EEI	Pri: 48	Potential USQ on changes made to main steam non-return check valve.
Dockets Discr 05000244 Gin		Sec:			Sec: 4C Ter:	The team identified several inadequate safety evaluations related to changes made to the main steam non-return check valves. Specifically, the valves were changed from free swinging gravity closing valves (as stated in the Updated Final Safety Analysis Report) to valves that required a substantial and increasing external force to close them, without addressing potential effects on steam generator integrity, containment integrity, steam generator tube integrity, reactor reactivity, or reactor vessel integrity. Other procedure changes failed to include safety evaluations. The team believes that changing the main steam non-return check valves to require a significant breakaway closing torque represents an Unreviewed Safety Question. This is an apparent violation of 10 CFR 50.59. (EEI 50-244/99-05-01). The licensee did not agree that these changes introduced an Unreviewed Safety Question. (Section E7.1) Reference LER 99-03 and If 99-03, section 08.1.
06/27/1999	1999004	Pri: ENG	NRC	POS	Pri: 4C	Engineering staff made progress to address instrument loop cal program weaknesses.
Dockets Discu 05000244 Gin		Sec:			Sec: Ter:	The licensee has made progress to address program weaknesses for total instrument uncertainty calculations on Improved Technical Specification related instruments. (E8.1)
05/16/1999	1999003	Pri: ENG	NRC	POS	Pri: 4B	Effective actions by licensee to address EDG delta peak firing pressure.
Dockets Discu 05000244 Gin		Sec:			Sec: Ter:	The licensee's actions were effective in reducing emergency diesel generator delta peak firing pressure and peak firing pressure to below the manufacturer's stated maximums.
05/16/1999	1999003-01	Pri: ENG	NRC	IFI	Pri: 4A	Licensee challenged by RPS OP and OT delta temperature protection RTD mod.
Dockets Discu 05000244 Gina		Sec:			Sec: 4B Ter:	The licensee was challenged with operational problems associated with a new plant modification that caused over-temperature and over-power delta temperature setpoints to drift. The licensee effectively identified and corrected some problems, and conservatively reduced reactor power while troubleshooting was in progress. Reference LER 99-0 and IR 99-08, section O8.3 which closed the LER.
04/04/1999	1999002	Pri: ENG	NRC	POS	Pri: 4B	Successful resolution of valve internals problems due to excessive throttling.
Dockets Disco 05000244 Gin		Sec:	-		Sec: 4A Ter:	The licensee successfully resolved internal valve degradation that resulted from heavy throttling of a service water valve by replacing it with a smaller valve that was more resistant to erosion. However, the system conditions that required heavy throttling of service water at the component cooling water heat exchangers were not yet resolved. The licensee continued to evaluate the need to increase service water flow to reduce siltation and erosion, and to maintain optimal component cooling water system temperatures.
04/04/1999	1999002	Pri: ENG	NRC	POS	Pri: 1C	Appropriate plant modifications and well implemented.
Dockets Disco		Sec: MAINT			Sec: 4B Ter: 4A	Plant modifications installed during the current refueling outage were good enhancements to the operation and reliabilit of plant equipment. The installation packages reviewed contained detailed instructions and information for performing and documenting the modification work. The safety evaluations reviewed were adequate to demonstrate that the modifications did not represent any unreviewed safety concerns.

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By Primary Functional Area / Issue Date

Region I GINNA

Date	Source	Functional Area	ID	Туре	Template Codes	Item Title Item Description
02/21/1999	1999001	Pri: ENG	NRC	POS	Pri: 4B	Temporary modifications
		Sec:			Sec:	The licensee's plan to remove 21 of the current 22 temporary modifications was a good initiative.
Dockets Discus 05000244 Ginna					Ţer:	•
12/12/1999	1999011	Pri: PLTSUP	NRC	POS	Pri: 1C	RGE maintained and implemented an adequate rad monitoring system cal program.
Dockets Discus	sed:	Sec:			Sec: 3A Ter:	RG&E maintained and implemented an adequate radiation monitoring system calibration program and an effective surveillance test program for effluent air cleaning systems (Section R2).
05000244 Ginna	ı •	a	-		V = V .	
12/12/1999	1999011	Pri: PLTSUP	NRC	POS	Pri: 2B	RGE maintained adequate radioactive liquid and gaseous effluent control programs.
		Sec:			Sec: 3A	RG&E maintained adequate radioactive liquid and gaseous effluent control programs. The offsite dose calculation
Dockets Discus 05000244 Ginna					Ter:	manual contained sufficient detail for acceptable implementation of the radioactive effluent control programs (Section R1.1).
12/12/1999	1999011	Pri: PLTSUP	NRC	POS	Pri: 2B	QA and self assessments of rad effluent controls were effective.
		Sec:	ec:		Sec: 3A	Quality assurance audit and self-assessment programs for radioactive effluent control were effectively implemented.
Dockets Discus 05000244 Ginna		•			Ter:	The quality control program for analytical results was effective (Section R7).
12/12/1999	1999011	Pri: PLTSUP	NRC	POS	Prl: 58	RGE corrective measures to address a plant computer issue were appropriate.
Dockets Discus		Sec:		-	Sec: 5C Ter:	RG&E's corrective measures to evaluate and prevent unauthorized external access to onsite computer systems were appropriate (Section S8.1).
00000244 GHAR	•		4			
11/18/1999	1999010	Pri: PLTSUP	NRC	POS	Pri: 2B	Overall emergency response organization performance was good.
Dockets Discus 05000244 Ginna		Sec: OPS		¢	Sec: 3A Ter:	Based on the results of this inspection, it was determined that the overall performance of the emergency response organization demonstrated, with reasonable assurance, that onsite emergency plans are adequate and that the licensee is capable of implementing them. Simulated events were diagnosed accurately, emergency declarations were timely and accurate, offsite agencies were notified in a timely manner, protective action recommendations were appropriate, and dose assessment activities were performed properly.

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Region I GINNA

Date	Source	Functional Area	ID	Туре	Template Codes	Item Title Item Description
11/18/1999	1999010	Prl: PLTSUP	NRC	POS	Pri: 2B	Licensee critique was balanced.
Dockets Discu 05000244 Gini		Sec: OPS			Sec: 3A Ter:	At the formal critique, your staff identified issues, in addition to those identified by the NRC. The most significant issues identified are under consideration for inclusion in the corrective action program. Overall, the critique was balanced with positive and negative findings and was appropriately self-critical.
10/31/1999	1999009	Pri: PLTSUP	NRC	POS	Pri: 2B	Effective implementation of the REMP and MMP.
Dockets Discu 05000244 Gina		Sec:			Sec: 3A Ter:	RG&E effectively maintained and implemented the radiological environmental monitoring program. Procedures and annual reports were adequate and contract laboratory oversight was effective. RG&E effectively maintained the meteorological monitoring system operable, and properly performed channel calibrations and functional tests. (R1.1 and R1.2)
10/31/1999	1999009	Pri: PLTSUP	NRC	POS 1	Pri: 28	Appropriate quality assurance audits of the REMP and MMP programs.
Dockets Discu 05000244 Gini		Seci		×	Sec: 3A , Ter:	Quality assurance personnel appropriately conducted an audit of the radiological environmental monitoring program, are the audit findings were properly acknowledged in the corrective action program. (R7.1)
08/08/1999	1999006	Pri: PLTSUP	NRC	POS	Pri: 2B	Radwaste management and transportation programs were adequately implemented.
Dockets Discu		Sec:			Sec: 3A Ter:	The radioactive waste management and transportation programs were adequately implemented as evidenced by a qualified staff carrying out detailed procedures. Radioactive waste and other radioactive materials were properly characterized, classified, packaged, and shipped. The licensee was evaluating various technologies to process and ship for disposal contaminated filter media that was classified as containing greater than Type C concentrations of radioactive materials.
08/08/1999	1999006	Pri: PLTSUP	NRC	POS	Pri: 28	Waste processing, handling, and shipping was well executed.
Dockets Discu 05000244 Gin		Sec:			Sec: 3A Ter:	Waste processing, handling, and storage areas were orderly, and containers were properly labeled and secured. A minor violation associated with the failure to post the waste evaporator room as a high contamination area was identified and included in RG&E's corrective action program.
08/08/1999	1999006	Pri: PLTSUP	NRC	POS	Pri: 2B	Staff involved with radwaste handling and shipping were well qualified and trained.
Dockets Discu		Sec:	۳		Sec: 3A Ter:	Personnel involved in waste handling and shipping activities have received the training required by NRC Bulletin 79-19 and 49 CFR 172, Subpart H. The staff was properly trained, qualified, and experienced.

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#### United States Nuclear Regulatory Commission PLANT ISSUE MATRIX

Region I

Date	Source	Functional Area	ID	Туре	Template Codes	Item Title Item Description
08/08/1999	1999006	Pri: PLTSUP	NRC	POS	Pri: 2B	Appropriate quality control measures in the radwaste area.
Dockets Disc 05000244 Gir		Sec:	3		Sec: 3A Ter:	Performance of radwaste management and shipping activities was effectively monitored and potential problem areas were elevated to the appropriate management level for resolution through various management controls, including audits, self-assessments, and quality control surveillances.
06/27/1999	1999004-01	Pri: PLTSUP	NRC -	NCV	Pri:	UNPLANNED RADIOLOGICAL EXPOSURES
Dockets Disc 05000244 Gir		Sec:			Sec: Ter:	Licensee management identified, after the fact, a series of unplanned exposure events that were the result of deficiencies in the implementation of radiological controls, contrary to Improved Technical Specification 5.7. In accordance with the established corrective action process, the licensee conducted a root cause assessment and completed (or planned) appropriate corrective actions to prevent a recurrence. However, the corrective actions following the individual events were not effective, in that they did not prevent recurrence of the subsequent unplanned exposure events. In addition, the overall series of events represented an indifference to proper radiological controls and precautions on the part of the individual radiation workers, radiation protection technicians, and direct supervision
07/19/1999	1999-S01-00	Pri: PLTSUP	••••		Pri:	involved in the events. The violation of Improved Technical Specifications was non-cited. (R8.1)  SAFEGUARDS EVENT
07/19/1999	1999-201-00		Licensee	LER		
Dockets Disc 05000244 Gir		Sec:			Sec: Ter:	Safeguards event. Reference IR 99-08, section S8.1.
05/16/1999	1999003	Pri: PLTSUP	NRC	POS	Pri: 1C	Radiological work controls during recent outage were appropriate.
Dockets Disc 05000244 Gir		Sec:			Sec: 3A Ter:	Overall, the licensee's radiological work and boundary controls inside containment'during the recent outage were effective in maintaining personnel exposures and contaminations at reasonably low levels. The pre-outage exposure and contamination goals were slightly exceeded at the end of the outage; however, the licensee maintained an acceptable level of oversight and control in this area.
04/04/1999	1999002	Pri: PLTSUP	NRC	POS	Pri: 1C	ALARA program well implemented.
Se Dockets Discussed: 05000244 Ginna		Sec:	-		Sec: 3A Ter:	"As Low As Reasonably Achievable" (ALARA) program requirements were well developed, integrated in the work control process, and effectively implemented with respect to the in-service inspection of reactor components. Dose levels received by individuals and work groups were closely monitored by the ALARA group. Dose information was provided to management for timely resolution of emergent issues, resulting in cumulative doses below estimates.
04/04/1999	1999002	Pri: PLTSUP	NRC	POS	Pri: 1C	Radiological controls program was well implemented.
Dockets Disc 05000244 Gir		Sec:			Sec: 3A Ter:	The radiological controls program was effectively implemented by qualified and experienced staff properly implementing detailed procedures and radiation work permits, appropriately monitoring personnel exposure, and adequately maintaining radiologically controlled areas. Work performance standards were effectively monitored and reinforced by close and frequent management and quality assurance oversight. Off-normal conditions were conservatively identified, appropriately evaluated, and resolved in a timely manner.

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#### United States Nuclear Regulatory Commission PLANT ISSUE MATRIX

Region I GINNA

Date	Source	Functional Area	ID	Туре	Template Codes	Item Title Item Description
04/04/1999	1999002	Pri: PLTSUP	NRC	POS	Pri: 1C	Security and safeguards activities well conducted.
Dockets Discu 05000244 Ginr		Sec:			Sec: 3A Ter:	The licensee conducted security and safeguards activities in a manner that protected public health and safety in the areas of access authorization, alarm stations, communications, and protected area access control of personnel, packages and vehicles. Security facilities and equipment were well maintained and reliable and were able to meet the licensee's commitments and NRC requirements. Security force members had the requisite knowledge to effectively implement the duties and responsibilities of their position(s).
04/04/1999	1999002	Pri: PLTSUP	NRC	POS	Pri: 1C	Management support of the security program evident.
Dockets Discu 05000244 Ginn		Sec:		Seç: 3A Ter:	Management support was adequate to ensure effective implementation of the security program. The licensee's audits were comprehensive in scope and depth, that the audit findings were reported to the appropriate level of management, and that the program was being properly administered. In addition, a review of the documentation applicable to the self-assessment program indicated that the program was being effectively implemented to identify and resolve potential weaknesses.	

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#### United States Nuclear Regulatory Commission PLANT ISSUE MATRIX

By Primary Functional Area / Issue Date

#### Legend

#### Type Codes:

BU	Bulletin
CDR	Construction
DEV	Deviation
EEI	Escalated Enforcement Item
IFI	Inspector follow-up item
LER	Licensee Event Report
LIC	Licensing Issue
MISC	Miscellaneous
MV	Minor Violation
NCV	NonCited Violation
NEG	Negative
NOED	Notice of Enforcement Discretion
NON	Notice of Non-Conformance
OTHR	Other
PŽ1	Part 21
POS	Positive
SGI	Safeguard Event Report
STR	Strength-
URI	Unresolved item
VIO	Violation
WK	Weakness

#### Template Codes:

1A	Normal Operations
1B	Operations During Transients
1C	Programs and Processes
2A	Equipment Condition
2B	Programs and Processes
3A	Work Performance
38	KSA
3C	Work Environment
4A	Design
4B	Engineering Support
4C	Programs and Processes
5A	Identification
58	Analysis
5C	Resolution

#### ID Codes:

NRC	NRC
Self	Self-Revealed
Licensee	Licensee

#### **Functional Areas:**

UPS	Operations		
MAINT	Maintenance		
ENG	Engineering		
PLTSUP	Plant Support		ı
OTHER	Other		ı
		-	
	-		
		-	

EEIs are apparent violations of NRC Requirements that are being considered for escalated enforcement action in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Action" (Enforcement Policy), NUREG-1600. However, the NRC has not reached its final enforcement decision on the issues identified by the EEIs and the PIM entries may be modified when the final decisions are made.

URIs are unresolved items about which more information is required to determine whether the issue in question is an acceptable item, a deviation, a nonconformance, or a violation. A URI may also be a potential violation that is not likely to be considered for escalated enforcement action. However, the NRC has not reached its final conclusions on the issues, and the PIM entries may be modified when the final conclusions are made.