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SUBJECT: Responds to violations noted in Insp Rept 50-244/89-15.

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January 31, 1990

Mr. William T. Russell
Regional Administrator
United States Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

Subject: Inspection Report 50-244/89-15
R. E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Russell:

This letter is to provide a response to the subject inspection regarding concerns in establishing proper system alignments and in the associated independent verification thereof.

In addition to the corrective actions associated with the Human Performance Evaluation System (HPES) Reports addressing the two incidents described in the inspection report, the following additional corrective actions are being taken:

1. The procedure addressing boric acid filter flush and isolation has been strengthened to provide tighter controls on isolation.

2. Through management directives, policies have been strengthened to insure complete on-shift attention to detail, improved in-depth communications and acknowledgement of responsibilities for return of equipment to service.

3. A general policy has been implemented that all miscellaneous vent and drain valves now are to be tagged, where practical, using the Station Holding Rules to control status during maintenance. The current Holding Policy requires independent verification to assure proper placement of isolation boundaries and subsequent removal thereof. This policy is formally being incorporated into our newly revised administrative holding procedure.

4. Operators have been made aware of the results of HPES 89-02 and HPES 89-03 involving the Human Performance Evaluations of the events.

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5. To address the corrective action recommendation identified in the HPES Report regarding strengthening interdepartmental communications, a representative from Operations now participates in the daily maintenance planning meetings.

6. We are continuing to strengthen our station operating procedures through our normal periodic review. Also, as a result of a recent P&ID project, we are currently developing a plan to upgrade all applicable alignment procedures.

7. Subsequent to Inspection report 89-15, Administrative Procedure A-52.4 "Control of Limiting Conditions for Operation" has been changed to further delineate expected actions of personnel for return to service of previously inoperable equipment. Specific examples are utilized within the body of the procedure to reinforce these requirements.

Through these actions, RG&E will continue to ensure proper system alignments and independent verification thereof. In addition, a comprehensive in-depth review is currently in progress to assess both training and implementation effectiveness. Corrective actions resulting from this assessment will be documented in corrective Action Report #1990.

Very truly yours,

Robert C. Mecredy
General Manager
Nuclear Production

xc: U.S. Nuclear Regulatory Commission (Original)
Document Control desk
Washington, D.C. 20555

NRC Senior Resident Inspector - Ginna Station