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

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December 28, 1989

Mr. William T. Russell
Regional Administrator
U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, Pennsylvania 19406

Subject: Inspection Report 50-244/87-27
Notice of Violation
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Russell:

As a result of the issues documented in Inspection Report 50-244/87-27, Rochester Gas and Electric Corporation embarked on numerous tasks necessary to enhance the Piping and Instrument Drawings. The main issue addressed in the inspection report was repeated examples of P&ID errors without clearly identifying the potential root cause and preventing recurrence.

Since that time, RG&E has taken appropriate action in root cause determination and resolution. The following five elements were contributors to the root cause.

- 1) Lack of a clear definition of the technical bases upon which the content of a system P&ID is based.
- 2) Inadequate communication of that technical base to all user organizations.
- 3) Insufficient organization of procedural requirements between organizations which prepare and use such drawings.
- 4) Inadequate field walkdowns and review of results during an initial upgrade program. These walkdowns were necessary because undocumented configuration changes were made in the past. (This has been addressed as part of RG&E's overall Configuration Management Program.)
- 5) Lack of good component identification at a detailed level and lack of guidelines for developing component identification.

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Corrective action steps to address these contributing root cause elements have been taken and completed. Some of these actions will remain as part of the ongoing drawing change process and station change control process.

As noted in previous correspondence (February 5, 1988, B. Snow to W. Russell) a Task Force was formed to address the long term corrective actions associated with creating the enhanced P&IDs. As a result, Engineering and Operations combined efforts producing a clearly defined technical basis for system P&IDs. Implementing this technical basis required a detailed plant mechanical walkdown. This walkdown process gathered nameplate data where available for all valves and mechanical equipment shown on a P&ID. Field labeling of valves not previously shown on P&IDs was also completed. The relabeling effort was mainly necessary for instrumentation valves.

Since the walkdown process was performed at a detailed level, "skid mounted" subsystems, such as the diesel generators and their associated support subsystems, had to be field verified and relabeled. During this process, the desire to create additional detailed drawings of skid mounted equipment was requested. To coordinate the renumbering of valves and labeling of skid mounted subsystems, implementation of a Standard Nomenclature List was utilized. As part of the developing Configuration Management Program, the Standard Nomenclature document and newly developed skid mounted equipment drawings will be reviewed for consistency. Both of these Configuration Management Program elements are presently punchlist activities which are due to be completed during the first half of 1990. The efforts of the walkdown process have provided the information used to redraw the P&IDs and create a mechanical equipment database.

The upgraded P&IDs have received a high level independent review to determine if any significant functional changes to the plant had occurred without being properly incorporated into the drawings. The review resulted in many minor differences but no functional deficiencies for the plant.

The status of this overall effort as of November 30, 1989 is as follows:

- Revised, redrawn and verified P&IDs are complete, have been distributed, and record copies are in Document Control.
- The mechanical equipment database has been developed and is presently going through final verification.
- Procedure modifications necessary to maintain the integrity of the upgraded P&IDs have been made. The procedures are in the final approval process, and P&ID training was completed December 5, 12, and 13. Procedure changes necessary to support the station enhanced change process are also in this same status. One key result of closure of this activity will be that the only acceptable methods of changing P&IDs are via a Drawing Change Request or Engineering Work Request. Multiple methods were available in the past.

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This effort constitutes compliance with the corrective action content and schedule. Walkdown validated P&IDs have been redrawn and issued. The root cause has been addressed and corrected.

Other project efforts such as final verification of the mechanical equipment database, training and completion of interfacing procedure reviews will be complete in early 1990 in conjunction with the Configuration Management Program requirements. Changes to the ongoing design modification process will be addressed if necessary at that time.

Very truly yours,


Robert C. Mecredy
General Manager
Nuclear Production

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Attachments

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