

ENCLOSURE 1

NOTICE OF VIOLATION

Rochester Gas and Electric Corporation  
R. E. Ginna Nuclear Power Plant

Docket No. 50-244  
License No. DPR-18

During NRC inspection from March 12 to April 15, 1991, the following violation was identified in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C.

Technical Specification 6.8.1 requires establishment and implementation of the applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, November 1972 (Safety Guide 33). That regulatory guide, Appendix A, Section I, specifies that maintenance which can affect the performance of safety-related equipment should be properly preplanned and performed in accordance with written procedures, documented instructions, or drawings appropriate to the circumstances. R. E. Ginna Administrative Procedure (A)-1401, Station Hold Rules, Revision 25, effective March 25, 1991, requires that the Holding Authority properly verify the adequacy of the isolated work area and that the Authorized Person for the hold assure that the equipment is properly isolated and it is safe to proceed with the work.

Contrary to the above, maintenance that could affect safety-related equipment performance was not procedurally established and implemented properly on April 2, 1991. This occurred when Component Cooling Water (CCW) Valve 738B was not assured to be properly isolated, leading to the shutdown of safety-related equipment in the CCW and Residual Heat Removal systems and to the declaration of an Unusual Event. This maintenance was not properly preplanned and performed in that the Hold Request did not specify that the operators manually backseat the valve, and the Holding Authority (Shift Supervisor) did not properly verify the adequacy of the isolated work area. Also, the authorized person (requestor) did not assure that the equipment was properly isolated. Additionally, Maintenance Procedure (M)-37.116.3, Valve Packing, Revision 0, effective March 9, 1991, for repacking the valve did not require verification that the valve was backseated prior to the start of the maintenance.

This is a Severity Level IV violation (Supplement I).

Pursuant to 10 CFR 2.201, Rochester Gas and Electric is required to submit to this office, within 30 days of the date of the letter transmitting this Notice, a written reply, including: (1) the reasons for the violation or, if contested, the basis for disputing the it, (2) the corrective steps taken and the results achieved, (3) the corrective steps to be taken to avoid further violations, and (4) the date when full compliance will be achieved. If good cause is shown, consideration will be given to extending the response time.

The reply directed above is not subject to clearance by the Office of Management and Budget under the Paperwork Reduction Act of 1980, Pub. L. 96-511.

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