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MECREDY,R.C. Rochester Gas & Electric Corp.
RECIP.NAME RECIPIENT AFFILIATION
JOHNSON,A.R. Project Directorate I-3

SUBJECT: Responds to NRC 940509-13 ltr re violations noted in insp rept 50-244/94-02.Corrective actions:meeting between security & R&T personnel was held & R&T updated info in their computerized system to document requirement.

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June 27, 1994

U.S. Nuclear Regulatory Commission
Document Control Desk
Attn: Allen R. Johnson
PWR Project Directorate I-3
Washington, D.C. 20555

Subject: Reply to a Notice of Violation
50-244/94-13-02,
dated May 27, 1994
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Johnson:

During NRC Inspection on May 9-13, 1994, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, that violation is listed below:

> Section 6.3 of the NRC-approved R.E. Ginna Nuclear Power Plant Security Plan, Revision A, dated May 1, 1991, states in part that emergency power for specified area illumination is supplied by a dedicated diesel-generator, that the emergency power supply will be activated after a specified time delay, that switchover to emergency power causes specified alarm annunciations, and that the security standby diesel will restore area lighting in a specified period after a loss of off-site power.
>
> R.E. Ginna Nuclear Power Plant Technical Specification 6.8.1, states, in part, that written procedures shall be established, implemented and maintained covering the activities of the NRC-approved Physical Security Plan.
>
> Security Emergency Diesel Test Procedure No. PT-12.3, Revision 18, dated December 26, 1991, specifies monthly surveillance testing of the security emergency diesel-generator.
>
> Contrary to the above, NRC review of security emergency diesel-generator test records and discussions with licensee management determined that the security emergency diesel-generator was not surveillance tested during the months of March 1993 and March 1994.

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(1) the reason for the violation, or, if contested, the basis for disputing the violation:

Rochester Gas & Electric Corporation (RG&E) accepts the violation. We acknowledge that the security emergency diesel-generator was not surveillance tested during the month of March 1994. However, further review of test documentation revealed that this test was performed during the month of March 1993, and that March 1994 was the only month this surveillance was not performed.

The Security Plan requirement which governs the testing of the security emergency diesel-generator had not been formally incorporated into the computerized test scheduling and tracking system that is managed by the Results and Test (R&T) group. Therefore, plant personnel made a conscious decision prior to the 1994 outage to defer the testing of the security emergency diesel-generator until prior to the completion of the 1994 outage. The negative consequences of this decision were not evident. These personnel were unaware of the Security Plan commitment, and were unaware that the test could not be deferred while at cold shutdown.

(2) the corrective steps that have been taken and the results achieved:

A meeting between Security and R&T personnel was held to discuss this violation, and the need to perform tests for security equipment at the frequency specified in the Security Plan, regardless of plant conditions.

R&T updated the information in their computerized system to document the requirement for testing of the security emergency diesel-generator at the frequency specified in the Security Plan, regardless of plant conditions.

(3) the corrective steps that will be taken to avoid further violations:

For all applicable surveillances that are to be performed independent of plant conditions, and are currently scheduled and tracked by the R&T group, the computerized system has been modified to require testing, regardless of plant conditions.

A comprehensive review is being implemented (of the Plant Security Plan, the Radiation Emergency Plan, and the Fire Protection Program) for similar time-directed testing requirements. The R&T computerized system will be modified to reflect the results of this review.

In the future, these surveillances (that are not plant-mode sensitive) will be expected to be performed when scheduled, regardless of plant conditions.

In the future, any changes to these plans/programs that impact on surveillance testing will be reviewed by R&T.

(4) the date when full compliance will be achieved:

Full compliance with monthly testing was achieved on April 8, 1994, when PT-12.3 was performed.

Very Truly Yours,

Robert C. Mecredy

xc: Mr. Allen R. Johnson (Mail Stop 14D1)
PWR Project Directorate I-3
Washington, D.C. 20555

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Ginna USNRC Senior Resident Inspector