



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



ROGER W. KOBER
VICE PRESIDENT
ELECTRIC & STEAM PRODUCTION

TELEPHONE
AREA CODE 716 546-2700

November 15, 1985

Mr. Thomas T. Martin, Director
Division of Radiation Safety and Safeguards
U.S. Nuclear Regulatory Commission
Region 1
631 Park Avenue
King of Prussia, PA 19406

Subject: I & E Inspection Report No. 85-18
Notice of Violations
R.E. Ginna Nuclear Power Plant Unit No. 1
Docket No. 50-244

Dear Mr. Martin:

As a result of the inspection conducted on September 3 to 6, 1985, and in accordance with the revised NRC Enforcement Policy (10 CFR 2, Appendix C), published in the Federal Register Notice (49 FR 8583) dated March 8, 1984, the following violations were identified:

A. "Technical Specification 3.16.1.1 states, in part, that the radiological environmental monitoring program shall be conducted as specified in Table 3.16-1. Table 3.16-1, Section 3, requires a composite sample of water to be collected at the Russell Station by collecting an aliquot at intervals not exceeding 2 hours.

Contrary to the above, the water sample at the Russell Station has not been composited in accordance with the requirements of the technical specifications. From January, 1984 to the date of the inspection, composite water samples were collected by taking a daily aliquot at the Russell Station."

B. "Technical Specification 4.10.1 states that radiological environmental monitoring samples shall be analyzed pursuant to the requirements of Table 4.10.1. Table 4.10.1, maximum values for the lower limits of detection (LLD), states that an LLD of 1 picocurie per liter for I-131 shall be achieved on 98% of water sample analyses.

Contrary to the above, the LLD of 1 picocurie per liter was not achieved for I-131 for all water sample analyses for the reporting period from January, 1984 to the present. The LLD achieved ranged between 8 and 110 picocuries per liter."

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- C. "Technical Specification 6.9.1.3, "Annual Radiological Environmental Operating Report", requires the inclusion of summarized and tabulated results in the form of a table of all radiological environmental samples taken during the report period.

Contrary to the above, the 1984 Annual Radiological Environmental Operating Report was submitted with LLDs provided in Table XII of the report which were the LLDs of previous report years. The LLDs reported in the 1984 Annual Report did not represent the actual LLD data for 1984."

- D. "Technical Specification 6.8.1 requires, in part, that written procedures be established, implemented and maintained covering the activities referenced in Appendix A of Regulatory Guide 1.33, November 1972. One of those activities, procedures for control of measuring and test equipment, in Section H of Appendix A, RG 1.33, requires that procedures be provided to assure that ... instruments ... are properly controlled, calibrated, and adjusted at specified periods to maintain accuracy.

Contrary to the above, no written procedure for the calibration of the Baird Low Activity Counter had been established, and four other procedures including HP-10.9, HP-10.5, CP-250, and CP-251 did not specify the frequency for the calibration and adjustment of the equipment to maintain accuracy. The equipment used to perform the required analytical measurements included the liquid scintillation counter, the gamma spectrometer, the meteorological instrumentation, and the meteorological transmitters."

- A. We agree with the item as stated.

An autosampler was installed at Russell Station on September 23, 1985, at which time we were within compliance with the Technical Specification.

The autosampler, which had been purchased for use at Russell Station, had not been installed due to its effect on plant operations when the sampler was running. This was in early 1982, when a grab sample was allowed by Tech Specs, so we decided to continue the grab sample program as it had existed since the initial environmental program had been initiated. Since weekly samples were being obtained and delivered to the environmental lab for analysis, the fact that the collection was not being performed by an autosampler was overlooked when this Technical Specification Amendment was placed in effect on January 1, 1984.

- B. We agree with the item as stated.

DATE November 15, 1985
TO Mr. Thomas T. Martin, Director

A new procedure designed to meet the 1 picocurie per liter LLD for Iodine-131 in water was placed in effect on September 23, 1985. This procedure is currently in use and we are in compliance with the Technical Specification.

C. We agree with the item as stated.

The table included with the 1984 report was based on expected background levels and efficiencies rather than what was specifically determined in 1984.

A corrected copy of Table XII of the 1984 Annual Radiological Environmental Report is being included as an attachment to this report. Please consider this our correction for the previously submitted report.

The 1985 report is being formulated using observed LLD data.

D. We agree with the item as stated.

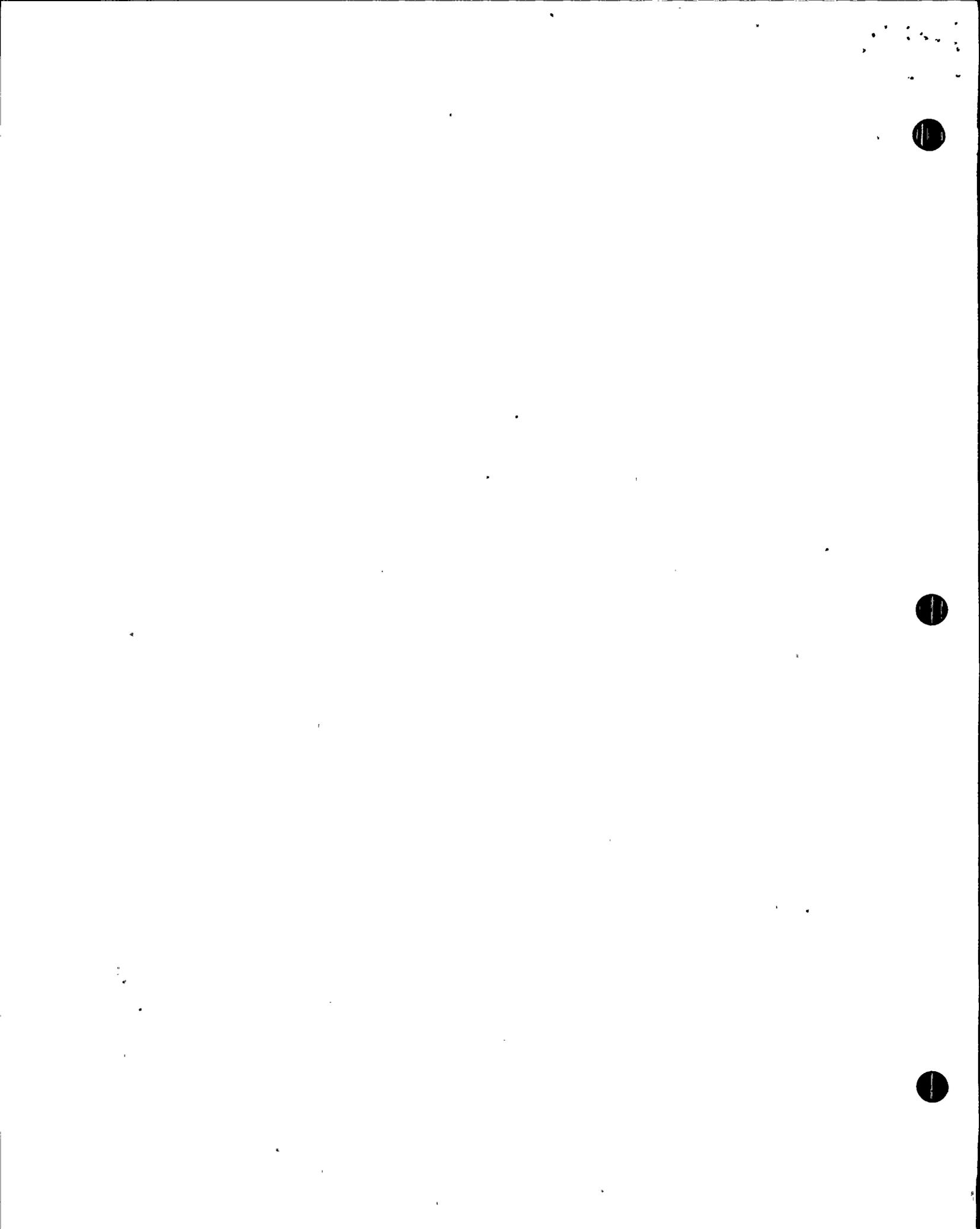
Procedure changes have been initiated to include the calibration frequencies in the four procedures listed. A new procedure has been written for the calibration of low background alpha/beta counting equipment. All of the above procedure changes are either in place or in the procedure review and approval process.

The procedures will have completed the review cycle and be issued prior to December 31, 1985, at which time we will be in full compliance with the Technical Specification.

In reference to your concern about the ability of QA/QC Program to identify and correct such deficiencies, we offer the following:

The audit program, for which the Nuclear Safety Audit and Review Board relies on the Quality Assurance Group, is the primary means of identifying deficiencies in Ginna programs and commitments. Previous audits of fire protection, rad waste shipping, test control, maintenance, corrective action, etc. clearly demonstrate the ability of the audit program to identify and correct deficiencies including related deviations from new and existing Technical Specifications requirements. The results of the limited scope audits of related activities in January 1984, August 1984 and August 1985 indicated that an earlier indepth assessment was not necessary. The biennial assessment of the ODCM, scheduled for December, was the intended indepth review of the Radiological Environmental Program and related Technical Specifications.

However, since problems recur with regard to timely implementation of changes to Technical Specifications, future changes will be verified by audits within two months of their effective dates. Depending on their nature and extent, this will be in conjunction with routine audits or be subject to a special audit.



ROCHESTER GAS AND ELECTRIC CORP.

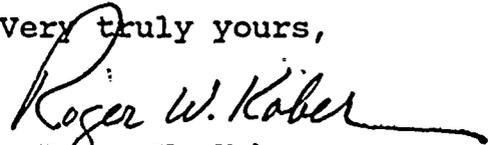
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DATE November 15, 1985

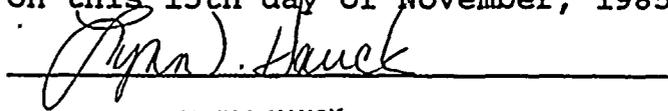
TO Mr. Thomas T. Martin, Director

In response to your concerns with respect to the "broader problem," within 30 days of the date of this letter, a plan and schedule will be submitted to you designed to prevent recurrence

Very truly yours,


Roger W. Kober

Subscribed and sworn to me
on this 15th day of November, 1985.



LYNN I. HAUCK

NOTARY PUBLIC, State of N.Y., Monroe County
My Commission Expires March 30, 1986

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Table XII

LOWER LIMIT OF DETECTION (LLD)

	Air Filters(a)	Water		Milk		Fish	Vegetation(a)
	pCi/M3 (minimum sple. 3500 M3/Qt.)	pCi/liter (sample of 3.5 liters)		pCi/liter (sample of 3.5 liters)		pCi/kg (ave. sple. 2 kg)	pCi/kg (ave. sple. 2 kg)
Ave Decay(c)	55 days	0.5 d	8 days	0.5 d		6 days	0.5 days
Be-7	0.025	60	66				
K-40	0.012						
Cr-51	0.063	77	91			220	130
Mn-54	0.002	5	5			13	10
Fe-59	0.007	7	8			25	10
Co-58	0.002	5	5			10	10
Co-60	0.002	5	5	6		10	10
Zn-65	0.004	9	9			25	20
Zr-95	0.005	8	9			20	20
Nb-95	0.004	5	6			14	12
Ru-103	0.004	7	7			18	15
Ru-106	0.017	57	59			120	120
I-131	0.03 (b)	9	16		10 Gamma 0.24 Beta	35	20
Cs-134	0.002	5	6			12	12
Cs-137	0.002	6	6		7	11	12
BaLa-140	0.024	4	6		4	12	8
Ce-141	0.010	19	24			50	40
Ce-144	0.035	82	92			175	150
Ra-226		12	12			25	24
Beta	0.004	1.6					

(a) LLD value will vary due to different sample sizes. Data based on 1984 background sample spectra.

(b) Charcoal Cartridge

(c) Ave. decay normal period from midpoint of sampling period to counting time.

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