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JOHNSON,A.R. Project Directorate I-3

SUBJECT: Responds to violations noted in Insp Rept 50-244/93-08 & discussed in enforcement conference.Corrective actions: failed crane Model 101XU svc water valves were replaced w/ qualified spares.

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August 23, 1993

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
Enforcement Conference Report for NRC Inspection 50-244/93-08 and the Notice of Violation, dated July 22, 1993
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Johnson:

An NRC Inspection was conducted on April 12-16, 1993 and May 24-28, 1993, and concluded on June 18, 1993. There was a subsequent Enforcement Conference on July 16, 1993. One violation of NRC requirements was identified during this inspection. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below:

"10 CFR 50, Appendix B, Criterion XVI, Corrective Action, states in part that "Measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected."

Contrary to the above, in April 1992 after a second service water valve failure of a non safety-related Crane Company model 101XU valve due to stem to disc separation by corrosion, adequate corrective actions were not taken to identify degradation or the impact of similar failures of safety-related valves in that on March 28, 1993, the licensee identified locked open safety-related manual valves 4669 and 4738 in failed closed position with stems to discs separated."

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At the Enforcement Conference of July 16, 1993, Rochester Gas & Electric personnel presented a detailed assessment of the circumstances surrounding this violation, including a rationale for the corrective actions that had already been taken, and acknowledgement that further corrective actions were warranted. These further actions are described in part (3) of our reply.

(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 measures were not in place to identify the condition of valves 4669 and 4738, and this failure to identify the condition resulted in corrective actions that were not prompt. As discussed at the Enforcement Conference, the failure of these valves was not evident during normal system operation and surveillance testing, due to the parallel path arrangement (for valve 4738) and to the redundant isolation capability (for valve 4669). Furthermore, feedback from maintenance performed on other Crane Model 101XU valves (in 1990, 1991, and 1992) did not indicate the need for immediate corrective action on other Crane Model 101XU valves. Therefore, inspections leading to corrective action were scheduled for 1993.

In retrospect, RG&E recognizes that actions taken prior to 1993 resulted in a missed opportunity to identify individual component failures.

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

The failed Crane Model 101XU service water valves (i.e. valves 4669 and 4738) were replaced with qualified spares of a different design and material composition, were tested satisfactorily and were returned to service.

As part of the Valve Improvement Program (VIP) and to prevent recurrence of the Service Water System valve failures, all other Crane Model 101XU valves in the Service Water System were assessed for functionality and those valves warranting replacement were replaced during the 1993 Annual Outage. In addition, selected Crane Model 101XU valves in the Component Cooling Water (CCW) and Auxiliary Feedwater (AFW) systems were inspected, with satisfactory results.

Also as part of the VIP and to prevent recurrence of the Service Water System valve type failures, all remaining crane model 101XU valves in the Service Water System are scheduled to be refurbished or replaced during the 1994 Annual Outage. In addition, remaining Crane Model 101XU valves in the CCW and AFW systems will be inspected in 1994.

As a result of tests performed on the Service Water System, the scope of maintenance was increased, and other Service Water System valves were also inspected during the 1993 outage. Valves found to be excessively deteriorated were replaced, and other valves were refurbished, if warranted. Inspection/refurbishment/replacement will continue during the 1994 and 1995 Annual Outages.

Based on the results of the VIP inspection/refurbishment/ replacement, a preventative maintenance frequency will be established as part of the reliability centered maintenance process.

To reinforce the generic applicability of this violation, Senior Plant Management has met with individuals responsible for assessing the generic implications of component failures. Lessons learned from this event have already been implemented to address generic applicability issues, such that adverse conditions are promptly identified and corrected. These are as follows:

- o Unusual plant and equipment conditions will be promptly reported to plant management.
- o Increased sensitivity to generic implications, in particular by maintenance analysts reviewing completed maintenance work orders.

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

IN-SITU nondestructive inspection processes have been identified that can be used to augment traditional methods of maintenance diagnostics. In particular, the use of non-intrusive processes such as radiography and thermography, and advanced techniques such as Time-Domain Reflectrometry (TDR) have been applied at Ginna Station. It is believed that the above valve failures could have been detected by the use of radiography. We will continue to expand the use of such processes to enhance the effectiveness of the maintenance diagnostics programs to promptly identify conditions adverse to quality.

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

Full compliance was achieved following the 1993 outage when the subject valves were replaced with valves of an improved design. Further enhancements, as a result of additional valve replacements and the diagnostic program, will be implemented to strengthen our program.

Very Truly Yours,

Robert C. Mecredy

Robert C. Mecredy

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