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# Rochester Gas and Electric Corporation

Inter-Office Correspondence

May 6, 1980

SUBJECT: Administrative Measures Taken to Detect End of Life  
in Ginna Station Electrical Components

TO: Mr. George Daniels

This memo documents efforts performed to formalize administrative measures employed to provide assurance that a change in failure rates of Ginna Station electrical components are investigated to identify age related degradation. This effort was necessary to provide a method for implementing the NRC staff position on Reg. Guide 1.89 for existing plants provided to RG&E by letter to Docket 50-244 dated 2-21-80.

Discussions were held with Ginna Station supervisory personnel (Spector, Edgar and Gent) who oversee the testing calibration and maintenance of electrical components. Based on discussions with these personnel, very few failures and very minimal drift rates have been experienced to date. Previously, most failures or abnormal instruments and control equipment drift were usually documented, evaluated, and reported to the NRC pursuant to regulations. Station personnel, as part of their maintenance responsibilities, would normally pursue an unusual failure or an increase in failure rate by requesting vendor or engineering assistance to conduct further evaluation. Appropriate action would be taken on the results of the evaluation.

In order to formalize measures previously in use, the following actions were taken:

- The position descriptions of station supervisory personnel responsible for calibration, test and maintenance of electrical components (Substation Electrician Foreman, I&C Foreman and Results and Tests Foreman) contained in Ginna Procedure A-201 were revised to specifically define the responsibility for detecting and reporting trends in increased failure rates to Quality Control (QC). QC will use an existing followup system e.g. PAR or CAR to provide assurance that appropriate investigations and corrective measures are performed and to provide visibility of the item to Station Management.

ROCHESTER GAS AND ELECTRIC CORP.

SHEET NO. 2

DATE May 6, 1980  
TO Mr. George Daniels

-During development of administrative measures, station supervisory personnel were made aware of the fact that identifying changes in failure rates is an important method of early detection of an end of life condition in electrical components, RG&E's commitment to the NRC regarding identification of changes in failure rates and the NRC's requirements to identify and investigate changes in failure rates.

This memo completes action and the assignment covered by the subject task. Should there be any questions, please advise.

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