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July 27, 1983

Dr. Thomas E. Murley, Regional Administrator
U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

Subject: I & E Inspection Report 83-13
Notice of Violations
Failure to Notify the Maintenance Department that the Containment Equipment Hatch Door Seal Leakrate Exceeded the Maximum Acceptable Administrative Limit and Containment Spray Pumps in Pull/Stop Position Above 200 Degrees RCS Temperature
R. E. Ginna Nuclear Power Plant, Unit No. 1
Docket No. 50-244

Dear Dr. Murley:

In accordance with the above subject which stated

"As a result of the inspection conducted on May 8, 1983 through June 16, 1983, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C) published in the Federal Register on March 9, 1982 (47 FR 9987) the following violations were identified:

A. 10 CFR 50, Appendix B, Criterion V states in part, "Activities affecting quality shall be prescribed by ... procedures ... and ... shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished."

Periodic Test Procedure (PT)-22.1, Equipment Hatch Door Seal Leakrate Test, Revision 7, requires that if the leakrate exceeds the maximum acceptable limit of 50 cubic centimeters/minute (cc/min), the Maintenance Department is to be notified to make a latch adjustment or replace the door gasket prior to retesting.

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Contrary to the above, during the performance of PT-22.1 on March 23, 1983, the equipment hatch door seal leakrate exceeded the maximum acceptable limit of 50 cc/min; however, the Maintenance Department was not notified or retesting performed. Further, subsequent supervisory review on March 26, 1983 failed to identify that the acceptance criteria was exceeded.

B. Technical Specification 6.8.1 states in part, "Written procedures shall be established, implemented and maintained ..."

-- Refueling Shutdown Surveillance Procedure (RSSP)-2.1, Safety Injection Functional Test, Revision 21, step 6.1.11.5 requires charging flow to be secured prior to simulating safeguards signals.

-- Operating Procedure (O)-1.1D, Pre-Heatup Plant Requirement Check List, Revision 16, step 5.1.1.6 requires the containment spray pumps to be operable before the reactor coolant system temperature is raised above 200 degrees.

Contrary to the above, the following instances of failure to implement procedures were identified:

-- During performance of RSSP-2.1 on June 9, 1983 charging flow was not secured prior to simulating safeguard signals, resulting in actuation of the Overpressure Protection System.

-- On June 13, 1983 the reactor coolant system temperature was raised above 200 degrees with the containment spray pumps inoperable.

the following is submitted in response.

Corrective action to address these violations are as follows:

For item A, procedure PT-22.1 "Equipment Hatch Door Seal Leakrate Test" has been changed to further emphasize the 50 cc/min maximum acceptable limit. It should be noted that the actual leakage measured by the March 23, 1983 test was only 58.4 cc/min which is well below the Technical Specification allowable leakage rate of .60 La (approximately 22,900 cc/min). Additionally, testing personnel have been reminded of the importance to verify test results are within the acceptance criteria limits and to take appropriate action if these limits are exceeded. Full compliance has already been achieved.

For item B, a change to Refueling Shutdown Surveillance Procedure (RSSP)-2.1 "Safety Injection Functional Test" has been submitted that will caution operators and test personnel of the importance to secure charging and letdown prior to simulating a safety injection signal as failure to do so could result in a pressure excurison causing operation of the reactor overpressure protection system. Full compliance has already been achieved.

Also for item B, while in the process of changing modes of operation (Cold Shutdown to Hot Shutdown) the Containment Spray pumps were found to be in the pull/stop position with Reactor Coolant temperature at 207 degrees fahrenheit. Procedure O-1.1D required that Containment Spray be operable prior to leaving Cold Shutdown (< 200°F). The Operators had mis-interpreted and considered the system operable at that time, but placed the pumps in pull/stop to guard against an inadvertent actuation of Containment Spray while Personnel were working inside Containment. Discovery of the situation was made long before this could have created a hazard to the health and safety of the public. Operating Personnel were reminded of the requirements, and an immediate change in O-1.1D specifically defines operability and cautions against pumps being positioned such that the system would be rendered inoperable.

Very Truly Yours,

John E. Maier

Subscribed and sworn to me
on this 27th day of July, 1983

WILLIS L. SCHULZE
NOTARY PUBLIC, State of N.Y., Monroe County
My Commission Expires March 30, 1985