

U.S. NUCLEAR REGULATORY COMMISSION
REGION I

Report No. 50-244/82-16

Docket No. 50-244

License No. DPR-18 Priority -- Category C

Licensee: Rochester Gas & Electric Corporation
89 East Avenue
Rochester, New York 14649

Facility Name: R. E. Ginna Nuclear Power Station

Inspection at: Ontario, New York

Inspection conducted: August 30 - September 3, 1982

Inspectors: *N. Blumberg* 9/27/82
N. Blumberg, Reactor Inspector date

P. Bissett 10/1/82
P. Bissett, Reactor Inspector date

Approved by: *D. L. Capton* 10/5/82
D. L. Capton, Chief, date
Management Programs Section

Inspection Summary:

Inspection on August 30 - September 3, 1982 (Report No. 50-244/82-16)

Areas Inspected: Routine, unannounced inspection of followup on previously identified inspection findings; administrative controls for design changes and modifications; and modification and design change program and its implementation. The inspection involved 68 inspector hours onsite by two region-based inspectors.

Results: No violations were identified in the three areas inspected.

DETAILS

1. Persons Contacted

- *E. Beatty, Operations Supervisor
- R. Duhane, Assistant Technical Engineer
- D. Fulkins, Supervisor Health Physics and Chemistry
- **A. Goetz, Rochester Gas & Electric (RG&E) Manager of Construction Engineering
- **J. Hutton, RG&E Manager of Mechanical Engineering
- *G. Meier, Project Liaison Engineer
- R. Morrill, Training Coordinator
- T. Nedopak, RG&E Project Construction Engineer
- *T. Schuler, Maintenance
- *B. Snow, Superintendent - Ginna
- *S. Spector, Assistant Superintendent - Ginna
- R. Vanderwheel, Modifications Project Manager

USNRC

- *R. Zimmerman, Senior Resident Inspector

The inspectors also interviewed other plant personnel including reactor operators, construction personnel, and clerical personnel.

*Denotes those present at exit interview.

**Denotes those contacted by telephone.

2. Licensee Action On Previous Inspection Findings

(Closed) Unresolved Item (244/78-18-01): Review calibration status of plant installed instrumentation which is used to verify technical specification surveillance requirements and establish calibration procedures as required. The inspector verified that procedure A-1105, "Calibration Surveillance Program for Instrumentation/Equipment of Safety Related" had been issued. This procedure identifies the instrumentation requiring calibration, the calibration procedure, and the licensee department which performs the calibration.

Based on the above, this item is closed.

(Closed) Violation (244/80-08-01): "As-built" information concerning modification Engineering Work Request (EWR)-1601 was not added to controlled drawings until 13 days after the modification was completed. The inspector verified that procedure A-603, "Control of Engineering Documents by Central Records" has been revised to require that after a sketch of modification changes is made, a copy is forwarded to Central Records and then in turn distributed to controlled drawing areas. Each drawing is annotated with the EWR number and the EWR is maintained in a separate book. Field Change Requests (FCR's) involving changes to drawings are also being distributed in the same manner.

The inspectors determined, by a sampling inspection of EWR's and associated FCR's, that affected controlled drawings were appropriately annotated and the sketches of EWR's and FCR's (when applicable) were being maintained at controlled drawing locations.

Based on the above, this item is closed.

(Closed) Violation (244/81-01-01): No procedures were established to implement the housekeeping requirements of ANSI N45.2.3. The inspector verified that procedure A-1306, "Housekeeping Control," had been issued which implements the requirements of ANSI N45.2.3. In addition, RG&E Ginna Station Quality Assurance Manual has been revised to require procedures be developed to address the requirements of Regulatory Guide 1.39.

Based on the above, this item is closed.

3. Administrative Controls for Design Changes and Modifications

Administrative controls for the design change and modification program and its implementation were inspected to determine their conformance with 10 CFR 50, Appendix B, "Quality Assurance Criteria for Nuclear Power Plants..."; Technical Specifications Section 6, "Administrative Controls" ANSI N18.7-1976, "Administrative Controls and Quality Assurance... For Nuclear Power Plants"; Regulatory Guide 1.64-1975, "Quality Assurance Requirements for the Design of Nuclear Power Plants"; and ANSI N45.2.11-1974, "Quality Assurance Requirements for the Design of Nuclear Power Plants." The following procedures were reviewed:

- A-55, Requests for Engineering Design Services, Revision 4, September 9, 1981
- A-102.5, Training of Modification Project Personnel, Revision 1, December 21, 1981
- A-203, Ginna Modification Project Organization, Revision 3, April 14, 1981
- A-301, Control of Station Modifications, Revision 14, December 7, 1981
- A-302, Preparation, Review and Approval of Design Input Documents for Minor Modifications, Revision 1, December 31, 1980
- A-303, Preparation, Review and Approval for Modifications or Special Tests, Revision 2, February 17, 1981
- A-304, Preparation, Review, Approval and Distribution Output and Design Review Documents for Minor Modifications, Revision 3, July 30, 1981

- A-501, Plant Procedures, Preparation and Classification, Revision 2, December 7, 1981
- A-502, Plant Procedure and Format Requirements, Revision 18, August 27, 1981
- A-601, Plant Procedure Document Control, Revision 18, June 15, 1982
- A-602, Plant Procedure Distribution, Revision 13, May 17, 1982
- A-603, Control of Engineering and Design Documents By Central Records, Revision 6, June 13, 1981
- A-604, Control of Construction Documents, Revision 6, August 27, 1981
- A-1402, Bypass of Safety Function or Jumper Control, Revision 1, June 13, 1981
- A-1501, Control of Nonconforming Items, Revision 1, December 15, 1980
- A-1502, Nonconformance Reports, Revision 3, December 5, 1980
- A-1701, Ginna Records, Revision 6, February 1, 1982
- Ginna Quality Assurance Manual, Section 3, Configuration Control, Revision 10, November 1, 1979

No violations were observed.

4. Facility Modifications and Design Changes

- a. Facility modifications performed at Ginna Nuclear power plant were inspected to the following criteria:
 - Safety evaluations and reporting of design changes were accomplished in accordance with 10 CFR 50.59
 - Modifications were accomplished in accordance with regulatory guides, ANSI standards and procedures listed in paragraph 3 above
 - Station Modification (SM) installation procedures were established
 - Code requirements and specifications were included in procedures
 - Procedures and drawings used in performance of modifications in progress were the latest revision

- Approved changes were obtained for design deviations
 - Adequate interfaces and interface communications existed between the design organization and the Ginna plant personnel and among various organizations at Ginna
 - When applicable, personnel received training concerning modified or newly installed systems/equipment
 - Acceptance tests were performed, and included acceptance values and standards
 - Plant prints/drawings and operating procedures were revised to reflect modified conditions
 - Procedural controls for temporary modifications, lifted leads and jumpers were adequate
 - Responsibilities were assigned for implementing design change/modification program
 - Completed design change/modification packages were transmitted for permanent record retention
 - Adequate records were maintained
- b. The following completed design change/modification packages were reviewed.
- Engineering Work Request (EWR)-2462, Reactor Coolant Pump Oil Collection System
 - EWR-1024, Main Steam Power Operated Relief Valve Replacement
 - EWR-2463, Installation of Fire Dampers
 - EWR-2604A, Reactor Subcooling Monitor
 - EWR-3130, Reactor Coolant Pressure Indication
 - EWR-2164, Steam Generator (S/G) Blowdown Heat Exchanger Bypass Piping
 - EWR-3418, Refueling Water Storage Tank (RWST) Level Indicator
 - EWR-3021, Diesel Generator Alternate Cooling (Modification accepted for operation but some modification work remains to be completed)

c. Modification Visual Inspections

- (1) In conjunction with the review of the above packages, the inspectors visually inspected work that was performed as part of EWR's 2164, 341B, and 3021. This visual inspection included verification that modification conformed to the "interim as-built" drawing for the S/G blowdown heat exchanger bypass (EWR 2164); verification of the installation of an additional level indicator for the Refueling Water Storage Tank (EWR 3418); and verification of installation of alternate cooling water supply valves and availability of alternate cooling water supply (EWR 3021).
- (2) Additionally, the inspector visually inspected EWR 2606, Post Accident Sampling, a modification which is currently in progress. This inspection included verification that current as built conditions reflected existing drawings; drawings and procedures in use were up to date; and that field change requests were submitted for in the field design changes.

d. Findings

- (1) EWR-3021, "Diesel Generator (D.G.) Alternate Cooling" was recently installed and accepted for operation by the Plant Operations Review Committee (PORC). This modification installed a valve in the Service Water Cooling to each D.G. which allows the connection of fire hoses from a municipal fire hydrant, located outside the turbine building, in case of failure of the service water pumps during D.G. operation. However, installation procedures SM-3021.1 and 2, "Alternate Cooling Water Supplies for the "A" ["B"] Diesel Generator," could not be completed because two valves in the Service Water System, which were physically deteriorated, had been temporarily replaced with spool pieces. It will take several months to obtain replacement valves. Absence of these valves does not affect normal system operation, nor would it affect operation of the backup cooling, if needed.

The inspector determined that the following deficiencies existed.

- Procedures were not prepared for the operation of the alternate D.G. cooling. Since procedures SM-3021.1 and 2 had not been completed and were in a hold status, steps in each procedure requiring preparation of new operating procedures had not been done.
- Some operators were unaware of the modification installation.
- The installation procedures (SM-3021.1 and 2) did not check the hookup or availability of the fire hoses.

The deficiencies noted above appear to be an isolated circumstance. This backup cooling system is not a requirement, and its installation was based on a previous commitment made to the NRC 2 or 3 years ago. To prevent recurrence, the licensee stated that a system would be developed to ensure that applicable plant procedures are written for modifications which are accepted for operation prior to completion of the SM procedure and that procedure(s) would be prepared for the operation of the alternate D.G. cooling by the beginning of the 1983 refueling outage. This item is unresolved pending completion of license action and subsequent NRC:RI review (244/82-16-01).

A licensee representative stated that, although not specified in the SM procedure, fire hose availability and hookup had been checked. This could not be confirmed during the inspection. With the aid of licensee personnel, the inspector independently verified that there were sufficient numbers and length of fire hoses to provide alternate cooling to both D.G.'s and the fire hoses did hookup to the new installed supply valves.

Operator awareness of modifications is discussed in paragraphs 4.d(2) and (4).

- (2) When an SM procedure is completed, there is a signoff for notification of the training coordinator. Since SM's 3021.1 and 2 (see paragraph 4.d(1)) were not completed, the training coordinator was not aware of EWR-3021 operational readiness and training of operators was not conducted.

Based on a sampling inspection, the inspector determined that training had been conducted on other modifications completed during the 1982 outage. However, through discussions with operations and training personnel, the inspector determined that training was often not accomplished prior to turnover to the plant for operation. This appeared to be caused by delays in routing of the completed SM procedure (see paragraph 4.d(3)). The training coordinator often did not see the completed SM until months after its completion. To correct this problem and assure that training (when needed) is conducted in a timely manner, the licensee stated that their current system will be evaluated and changes made, as required, by the beginning of the 1983 refueling outage. This item is unresolved pending completion of licensee action and subsequent NRC:RI review (244/82-16-02).

Although a licensee representative was able to provide documentation of training on completed modifications, when requested by the inspector, the inspector observed that the traceability of training records appeared to be poor. Training records did not associate modification numbers with dates of training. Training

records more than a year old which had been sent to central records would be difficult to locate. The licensee acknowledged the inspectors concerns and stated this area would be investigated. The inspector had no further questions at this time, but informed the licensee that traceability of training records would be the subject of future inspections.

- (3) During the inspectors' review of the above design/modification packages, the licensee experienced difficulty in locating modification package EWR 2462. The licensee stated that essentially no one was responsible for tracking the whereabouts of completed modification packages when they were being routed for final review by appropriate supervisory personnel. EWR 2462 was eventually located two days after the inspector's initial request, and the inspector determined that EWR 2462 had been out for review for over ten months; and had, thus far, been reviewed by only one individual. The licensee explained that completed modification packages would often not be reviewed by appropriate supervisory personnel until certain conditions were met, such as the receipt of vendor manuals. Seldom were the packages forwarded on to the next individual during the interim. Consequently, completed modification packages would remain in the review cycle for months prior to reaching central records for microfilming.

The inspector stated that because of the importance of modification documents and the fact that the review cycle could possibly take up to several months, some system of controls (i.e., tracking system) should be developed to preclude the possibility of misplacing or destroying applicable documentation. The licensee representative agreed with the inspector's comments and agreed to review this area of concern, taking appropriate action by the beginning of the 1983 refueling outage. This item is unresolved pending completion of licensee action and subsequent NRC:RI inspection (244/82-16-03).

- (4) The inspector observed that SM's were approved by the PORC and that acceptance for operation of completed modifications was accomplished by the PORC based on certifications of job completion. Although the Operations Engineer is a member of the PORC, it appeared that subordinate operations personnel were not always aware of what modifications were in progress nor did they have input as to their satisfaction with completed modifications.

The inspector informed the licensee that although the present method of accepting completed modifications met regulatory requirements, operations staff involvement with ongoing and completed modifications could be beneficial. The licensee acknowledged the inspectors comments and stated this area would be investigated. The inspector had no further questions at this time.

5. Unresolved Items

Unresolved items are matters about which more information is required in order to ascertain whether they are acceptable, deviations or violations. Three unresolved items were identified during this inspection and are detailed in paragraphs 4.d(1), (2), and (3).

6. Management Meetings

Licensee management was informed of the scope and purpose of the inspection at an entrance interview conducted on August 30, 1982. The findings of the inspection were periodically discussed with licensee representatives during the course of the inspection. An exit interview was conducted on September 3, 1982 (see paragraph 1 for attendees) at which time the findings of the inspection were presented.