



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

JOHN E. MAIER
Vice President

TELEPHONE
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September 15, 1982

Mr. Eldon J. Brunner
U.S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

Subject: I & E Inspection Report 82-14
Notice of Violations
Overdue Surveillance Test Performance
R. E. Ginna Nuclear Power Plant, Unit No. 1
Docket No. 50-244

Dear Mr. Brunner:

In accordance with the above subject which stated

"During inspection on July 1-31, 1982 and in accordance with NRC Enforcement Policy, 10 CFR 2, Appendix C (47FR-9987), March 9, 1982, the following violation was identified.

Technical Specification 4.1.1 requires that effective upon completion of the Spring 1982 refueling outage, a monthly surveillance test will be performed of the loss of voltage/degraded voltage protection for the 480 volt safeguards buses.

Contrary to the above, as of July 16, 1982, the monthly surveillance test for the loss of voltage/degraded voltage protection for the 480 volt safeguard buses had not been performed; a period in excess of one month after completion of the Spring 1982 refueling outage (May 25, 1982)."

the following is submitted in response.

Corrective action to address this violation is as follows:

As stated in the Notice of Violation regarding performance of the initial test of the Loss of Voltage/Degraded Voltage protection system, a violation of Technical Specification 4.1.1 did exist.

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PDR ADOCK 05000244
G PDR

ROCHESTER GAS AND ELECTRIC CORP.
DATE September 15, 1982
TO Mr. Eldon J. Brunner

SHEET NO. 2

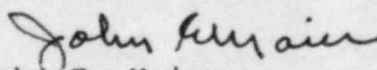
Discovery of this violation was made by the Licensee and corrective measures were being taken when the oversight was pointed out by the Resident Inspector.

It should be pointed out that these systems had gone through exhaustive acceptance testing just prior to criticality on May 25, 1982. The monthly test was in the process of being developed from these acceptance tests at the time when the missed surveillance interval was identified.

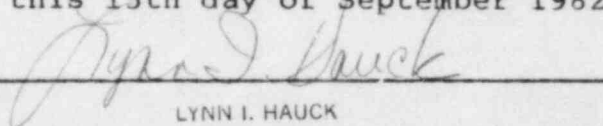
Using the May 25, 1982 date as the basis for establishing the monthly interval would require performance of the test (one month plus 25%) no later than July 2, 1982. The test of all four 480 Volt Safeguard Buses was actually completed on July 17, 1982. In an effort to ensure complete adequacy of this procedure, a draft was distributed to the off-site Engineering Department so it could be reviewed by the Responsible Engineer and an assistant who had been charged with writing the initial acceptance tests. This, unfortunately, added to delays due to other post-outage activities and the fact that cognizant individuals were on vacation at the time.

The initial monthly test was performed satisfactorily and has now been added to the regular monthly schedule for the Test Department.

Very Truly Yours,


John E. Maier

Subscribed and sworn to me
on this 15th day of September 1982.



LYNN I. HAUCK

NOTARY PUBLIC, State of N.Y., Monroe County
My Commission Expires March 30, 1984