



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

JOHN E. MAIER
Vice President

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AREA CODE 716 546-2700



October 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 82-15
Notice of Violations
Failure to Provide Thirty Day Written Report For Inoperable
Fire Equipment
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 August 1-31, 1982 and in accordance with NRC Enforcement Policy, 10 CFR 2, Appendix C (47FR9987), March 9, 1982, the following violation was identified.

Technical Specification 3.14.1 requires that with the fire detection instruments specified in Table 3.14-1 inoperable for greater than fourteen days, a Thirty Day Written Report shall be submitted outlining the cause of the inoperability and plan for restoring the instruments to operable status.

Contrary to the above, as of August 31, 1982, a Thirty Day Written Report had not been submitted documenting that several fire detection instruments specified in Table 3.14.1 had been declared inoperable on July 12, 1982, due to exceeding the surveillance testing frequency, and had not been returned to operable status within fourteen days."

the following is submitted in response.

The cause of this item of non-compliance was a breakdown in Administrative controls established to track Limiting Conditions for Operations. When the fire detection systems were declared inoperable, an A-25.1,

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Rochester Gas and Electric Corp.
Date: October 15, 1982
TO: Mr. Eldon J. Brunner

Sheet No. 2

Ginna Station Event Report and an A-52.4, Control of Limiting Conditions for Operating Equipment were initiated. The A-25.1 is a mechanism for notifying the Duty Engineer, Operations Engineer, Shift Supervisor, Operations Assessment Engineer, and the NRC Resident Inspector of an operational event. It also provides tracking through the Shift Supervisor's Assessment, Duty Engineer's Assessment, and the Plant Superintendent/PORC review. With this event, the assessment by the Duty Engineer indicated the limiting condition for operation would be reportable if the fire detection systems were not returned to operable status within 14 days. The Plant Superintendent/PORC review on 07/21/82, indicated concurrence with the action taken (establishment of fire watches) however, no further tracking mechanism, such as a Corrective Action Report, was deemed necessary because on 07/21/82, the 14 day time frame was not elapsed. Without the Corrective Action Report, and with the A-25.1 closed out, no tracking mechanism existed to assure the 30 day report was written. This situation has been discussed with the Operations Engineer and the Plant Superintendent. This situation has also been determined to be an isolated case and unique only to fire systems. No further action was deemed necessary.

Very Truly Yours,

John E. Maier
John E. Maier

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

Lynn I. Hauck

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