

APPENDIX A

NOTICE OF VIOLATION

Rochester Gas and Electric Corporation  
R. E. Ginna Nuclear Power Plant

Docket No. 50-244  
License No. DPR-18

As a result of the inspection conducted on October 18, 1983 through November 18, 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:

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

Administrative Procedure (A)-301, Control of Station Modifications, Revision 17, May 5, 1983, paragraph 3.3.9 states, "Prior to placing a Station Modification (SM) in service, the SM shall be reviewed for operability to ensure that the SM procedure has been completed as necessary for the modification to perform its intended function. These reviews shall include, as a minimum, an interim walkdown inspection by QC and verification of acceptable inspection and test results."

Contrary to the above, on July 15, 1983 a station modification, Post Accident Sampling System (PASS), was placed in service and considered operable without reviewing the SM procedure to ensure it had been completed as necessary for the modification to perform its intended function. Further, acceptable inspection and test results were not verified, in that open items resulting from walkdown inspections and field changes; surveillance and nonconformance reports; and QC functional testing concerns, were not adequately evaluated with regard to operability prior to placing the PASS in service.

This is a Severity Level IV violation (Supplement 1).

2. 10 CFR 50, Appendix B, Criterion X, Inspection, states in part, "A program for inspection of activities affecting quality shall be established and executed...to verify conformance with the...procedures...for accomplishing the activity."

Ginna Station Quality Assurance Manual, Section 10, Inspection, Revision 12, March 1, 1983 establishes a verification program, comprised of both inspection and surveillance monitoring, to verify activities affecting quality are accomplished in accordance with approved procedures.

Administrative Procedure (A)-203, Ginna Modification Project Organization, Revision 3, April 14, 1981, paragraph 3.4.7.10 states it is the responsibility of the Project Quality Control (QC) Engineer to assure performance of surveillances of constructor (Bell-Schneider) and Project activities. Material storage is an activity referenced to require surveillance.

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Bell-Schneider Plant Procedures Manual 3.7, Material Control, Revision 1, September 26, 1980, paragraph 4.5.3.1 requires in part, that access to storage areas be controlled; cleanliness and good housekeeping practices be enforced at all times; and seals, end caps or approved covers be installed in prefabricated assemblies. Additionally, paragraph 4.9 requires that materials requisitioned from stock and not used are to be returned to stock for future use.

Contrary to the above, QC surveillance of material storage performed in the Project Quality Assurance Storage Area was determined to be inadequate, in that on October 18, 1983:

- access to the storage areas was not controlled;
- poor cleanliness and housekeeping practices existed;
- several prefabricated piping assemblies were not capped or otherwise sealed; and,
- approximately twelve, 3-way solenoid valves requisitioned from stock and not used were not returned to stock, but were left for several months uncapped with "accept" tags attached in the adjacent fabricating area.

This is a Severity Level V violation (Supplement 1).

3. Technical Specification 6.8.3 states in part, that temporary changes to procedures may be made provided the intent of the original procedure is not altered and the change receives the necessary plant management approvals.

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

Administrative Procedure (A)-503, Plant Procedure Adherence Requirements, Revision 6, March 2, 1983, paragraphs 3.1.1 through 3.1.1.3.1 requires that procedures in use must be completely filled out and signed off, allowing that a step may be marked "not applicable" provided a procedure change has been approved.

Contrary to the above, as of November 18, 1983 the following examples of failure to properly adhere to an administrative procedure were identified:

- Station Modification Procedure (SM)-2606.5D, Pre-Operational Test-Pass Waste Evacuating Compressor, Revision 0, December 3, 1982, performed January 14-15, 1983 contained numerous examples where portions of steps were crossed out or marked "not applicable" without a procedure change being initiated and approved.

- Separate pages from SM-2606.1, Mechanical Installation of the Post Accident Sampling System, Revision 0 and 1 were combined into one procedure instead of completely filling out and signing off each procedure separately. Similarly, separate pages from SM-2606.1A, Steam Generators 1A and 1B Blowdown Sampling Line Installation, Revision 0 and 1 were also combined.

This is a Severity Level V violation (Supplement 1).

Pursuant to the provisions of 10 CFR 2.201, Rochester Gas and Electric Corporation is hereby required to submit to this office within 30 days of the date of the letter transmitting this notice, a written statement or explanation in reply, including for the above violations: (1) the corrective steps which have been taken and the results achieved; (2) the corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.