



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

June 10, 1983

JOHN E. MAIER  
Vice President

TELEPHONE  
AREA CODE 716 546-2700

Mr. James Allan, Regional Administrator  
U.S. Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
Region I  
631 Park Avenue  
King of Prussia, Pennsylvania 19406

50-244

Subject: I&E Inspection Report 83-05  
Notice of Violation - Incomplete Preliminary  
Safety Evaluation  
Notice of Deviation - Failure to Fully Implement a  
Licensee Commitment

Dear Mr. Allan:

The Notice of Violation contained in Inspection Report 83-05 states the following:

"Contrary to the above, (10CFR50, Ginna Quality Assurance Manual Section 3, Quality Engineering Procedure 311) the Preliminary Safety Evaluation, approved on February 3, 1983, for the installation of the non-seismic closure device in place of the containment equipment hatch during refueling activities, did not evaluate and document the consequences of a seismic event in determining whether the proposed major modification involved an unreviewed safety question."

The corrective steps which have been taken as a result of this violation are that a revised Safety Analysis (EWR 3107B, Rev. 1) has been prepared, reviewed and approved in accordance with Engineering Department Procedures. The Design Criteria and revised Safety Analysis were subsequently reviewed and approved by the PORC (meeting 83-45, April 11, 1983) and NSARB (meeting 136, April 12, 1983). To preclude recurrence, personnel have been reminded to review all events for applicability and to include all applicable events in the Safety Analysis. Full compliance has already been accomplished.

The Notice of Deviation contained in Inspection Report 83-05 states the following:

"Contrary to the licensee's commitment the following corrective actions had not been fully implemented:

- Although records are maintained of all tests to be performed (monthly Surveillance Schedule) no Master Log containing a remarks column is being maintained by the Results and Test Department.

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DATE June 10, 1983  
TO Mr. James Allan

- No verification of the schedule by three Results and Test Technicians is administratively required nor is any verification of its performance documented or otherwise indicated.
- The Results and Test Supervisor's Master Log was the same monthly surveillance schedule as maintained by the Results and Test Department. This same monthly surveillance schedule is also distributed to various departments and other personnel onsite. No verification of the Results and Test Department Master Log is administratively required or otherwise indicated as being performed."

This Notice of Deviation stems from a January 27, 1983 letter from John Maier to Ronald Haynes responding to a Notice of Violation contained in I&E Inspector Report 82-24. This Notice of Violation states the following:

"Technical Specification 4.1.1 requires a surveillance test of the loss of voltage/degraded voltage protection for the four 480 volt safeguard buses at least every thirty-one days  $\pm$  25%.

Contrary to the above, as of October 28, 1982, the surveillance test frequency of the loss of voltage/degraded voltage protection for three of the four 480 volt safeguard buses exceeded thirty-one days  $\pm$  25% by 3 days."

Our records show and your inspection report states that PT-9.1 "Undervoltage Protection -480 Volt Safeguard Buses" was performed on September 20, 1982 (September 29, 1982 Bus 17 only) and October 28, 1982. The period of time from September 20 to October 28 is within the 31 days  $\pm$  25% as allowed by Technical Specification 4.1.1. Thus, it is our opinion that we acted in full compliance with our Technical Specifications and ask that you withdraw section B of the Notice of Violation contained in Appendix A of Inspection Report 82-24.

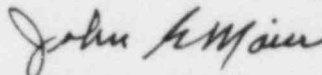
The January 27, 1983 letter made specific commitments to you that were not fully implemented. Our failure to implement these commitments resulted from the Results and Test personnel not being familiar with them. This was stated by your inspector in Inspection Report 83-05. Inspection Report 83-05 also addresses other instances where RG&E reported incorrect or inaccurate information to you. Our corrective action to this problem was addressed at a recent Enforcement Conference held at your office on June 1, 1983.

DATE June 10, 1983  
TO \*Mr. James Allan

A conscious effort is continuously being maintained by the Results and Test Section as well as the Results and Test Supervisor to maintain full compliance with the Surveillance Schedule. This is accomplished by a constant review of upcoming and completed tests by use of a scheduling board as well as maintaining a current surveillance schedule. In addition, a comment section has been added to the surveillance schedule to be used to log unscheduled test completions and other pertinent testing information.

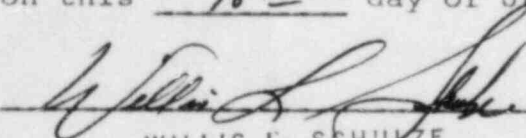
In addition, a review of the Ginna Technical Specification testing requirements as compared to the current surveillance program is currently in progress. This review should be completed by November 1, 1983 and will ensure that the surveillance program includes all the Technical Specification requirements. This review, coupled with the increased effort to maintain the surveillance schedule should ensure that surveillance test frequencies are not exceeded.

Very truly yours,

  
John E. Maier

JEM/lms

Subscribed and sworn to me  
on this 10<sup>th</sup> day of June, 1983

  
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WILLIS L. SCHULZE

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