

MAY 10 1984

Docket No. 50-244

Rochester Gas and Electric Corporation  
ATTN: Mr. Roger W. Kober  
Vice President  
Electric and Steam Production  
49 East Avenue  
Rochester, New York 14649

Gentlemen:

Subject: Enforcement Conference 50-244/84-07

This refers to the Enforcement Conference held at the NRC Region I Office on April 6, 1984 with yourself and members of your staff, regarding findings associated with the NRC inspection conducted between February 13 through March 1, 1984, at the R. E. Ginna Nuclear Power Plant, Ontario, New York, of activities authorized by NRC License No. DPR-18. This also refers to your letter of April 6, 1984 in response to our report on the subject inspection (50-244/84-03), which was forwarded to you by our March 21, 1984 letter. This report described the details associated with the violation of Technical Specification administrative requirements and the failure to take corrective action after the issues were identified during an internal Quality Assurance (QA) audit. These issues were further discussed during a subsequent telephone conversation between you and Messrs. H. Kister, S. Collins, and W. Lazarus of this office on April 19, 1984.

At this meeting and during the subsequent telephone conversation we expressed to you that our primary concern is that there are indications that your QA programs may not be fully effective. The first indication dealt with followup of an allegation that not all QA audit findings were being documented and resolved. Our inspection substantiated this allegation in two instances, as detailed in our Inspection Report 84-03. In the case of the failure to have a PORC quorum, you have indicated in your response that a Corrective Action Report has been generated to document and address corrective action in this area. No further response is required on this item (Violation A, Appendix A) at this time. Your corrective action will be reviewed during a subsequent inspection. In the case of use of a surveillance test procedure prior to approval by the Plant Superintendent, (Violation B, Appendix A) you have indicated that it is practice for the Plant Superintendent to sign a procedure immediately after the Plant Operations Review Committee review. The date of his signature is not documented, however a future "effective date" is indicated on the procedure below his signature. This "effective date" has been considered by us as the date at which the procedure is approved for use. The practice you describe, of allowing a procedure to be used prior to its "effective date" can result in two revisions of the same procedure available for use at the same time. Based on this concern, your request that this violation be withdrawn is denied. Violation C of Appendix A is considered to be more significant in that it indicates a problem with the effectiveness of your quality assurance audits. A thorough evaluation of the audit findings on these items should have resulted in appropriate corrective action, when in fact, the audit findings were not properly evaluated or resolved.

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The previous indication of a problem with your QA audits was brought to your attention in our Inspection Report 83-23 which concerned inadequate controls of project storage areas and significant discrepancies in controlling the construction, testing, and turnover of the Post Accident Sampling System (PASS). These inadequacies should have been identified by your QA audit program. It is also noted that an outside audit of your management controls in December, 1982, identified the same types of inadequacies in the control of station modification activities that our inspector identified during a review of the PASS construction, testing, and turnover. This indicates that any corrective action taken in response to the December, 1982 audit, was ineffective and untimely.

As you noted in our April 6, 1984 meeting, the audit finding concerning untimely corrective action in establishing vendor manual controls, was not one of the audit findings which was deleted from Audit Report 83-36:SB. Thank you for bringing this to our attention.

We understand that you plan to include a review of the effectiveness of your QA programs as part of your biennial management audit which will be completed later this year. Please keep us informed as to the scope and timing of this audit. The violations identified during inspection 84-03 are set forth in the Notice of Violation, enclosed herewith as Appendix A. These violations have been categorized by severity level in accordance with NRC Enforcement Policy (10 CFR 2, Appendix C) published in Federal Register Notice (47 FR 9987) dated March 9, 1982. You are required to respond to this letter, and in preparing that response, you should follow the instructions in Appendix A.

In accordance with 10 CFR 2.790(a), a copy of this letter and the enclosure will be placed in the NRC Public Document Room unless you notify this office, by telephone, within ten days of the date of this letter and submit written application to withhold information contained therein within thirty days of the date of this letter. Such application must be consistent with the requirements of 10 CFR 2.790(b)(1). The telephone notification of your intent to request withholding, or any request for an extension of the 10-day period which you believe necessary, should be made to the Supervisor, Files, Mail and Records, USNRC Region I, at (215) 337-5223.

The responses directed by this letter and the accompanying Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Your cooperation with us in this matter is appreciated.

Sincerely,

**Original Signed By:**

Richard W. Starostecki, Director  
Division of Project and Resident  
Programs

MAY 10 1984

Enclosure:

- 1. Appendix A, Notice of Violation
- 2. NRC Region I Enforcement Conference  
Number 50-244/84-07

cc w/encl:

Harry H. Voigt, Esquire  
 Michael Slade  
 Central Records (3 copies)  
 Director, Power Division  
 Public Document Room (PDR)  
 Local Public Document Room (LPDR)  
 Nuclear Safety Information Center (NSIC)  
 NRC Resident Inspector  
 State of New York

bcc w/encl:

Region I Docket Room (with concurrences)  
 Senior Operations Officer (w/o encls)  
 ,DPRP Section Chief

*[Signature]*  
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