

U.S. NUCLEAR REGULATORY COMMISSION
REGION I

Report No. 50-244/84-07

Docket No. 50-244

License No. DPR-18 Priority - Category C

Licensee: Rochester Gas and Electric Corporation
49 East Avenue
Rochester, New York 14649

Facility Name: R. E. Ginna Nuclear Power Plant

Meeting At: USNRC Region I, King of Prussia, PA.

Meeting Conducted: April 6, 1984

Inspectors: *W. J. Lazarus*
W. J. Lazarus, Project Engineer

4/23/84
date

W. A. Cook
W. A. Cook, Resident Inspector
Ginna

4/23/84
date

Approved by: *Samuel Hollins*
S. J. Collins, Chief, Reactor
Project Section 2C, DPRP

4/27/84
date

Meeting Summary:

Enforcement Conference on April 6, 1984 (Report No. 50-244/84-07) Summary:

Special enforcement conference convened by NRC Region I management to discuss NRC concerns regarding the effectiveness of the QA program at the Ginna Site resulting from NRC Inspection 50-244/84-03 conducted between February 13 and March 1, 1984. Senior Licensee and NRC Region I management attended the meeting held in the Region I office, which was about two hours in duration.

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DETAILS

1. Attendees

Rochester Gas and Electric Corporation

- R. Kober, Vice President, Electric and Steam Production
- B. Snow, Plant Superintendent
- C. Anderson, Quality Assurance Manager

U. S. Nuclear Regulatory Commission

- J. Allan, Deputy Regional Administrator
- R. Starostecki, Director, DPRP
- H. Kister, Chief, Projects Branch No. 2
- S. Collins, Chief, Reactor Projects Section (RPS), No. 2C
- W. Lazarus, Project Engineer, RPS No. 2C
- R. Zimmerman, Senior Reactor Inspector, Ginna
- W. Cook, Resident Inspector, Ginna
- G. Dick Jr., LPM, NRR (ORB 5)
- D. Holody, Enforcement Specialist
- E. Blackwood, Acting Director of Enforcement, IE
- A. Gody, Chief, Management Programs Section
- T. Harpster, Lead Reactor Engineer, Management Programs Section

2. Discussions

NRC Region I management opened the meeting by summarizing their concern regarding the role of the Quality Assurance (QA) program and its effectiveness. Specific examples were then presented to the licensee to identify the basis for the NRC's concern. These examples were:

- Draft audit findings from an internal QA audit of station administration controls were not included in the final audit report, nor were they documented and satisfactorily resolved (Inspection Report 84-03).
- QA audits did not identify inadequate control of the project storage area or significant discrepancies in the construction, testing, and turnover of the Post Accident Sampling System (PASS), (Inspection Report 83-23).
- A preliminary review by the NRC of the December 1982 management Assessment Audit for the Ginna Station Quality Assurance Program conducted by Gilbert/Commonwealth Quality Assurance Division, revealed that significant deficiencies were identified with the control of activities associated with modification testing. In spite of this, a timely response and effective program was not implemented prior to the turnover and testing of the PASS in the summer of 1983.

Licensee representatives acknowledged the NRC's concerns and stated that an internal review of the general concerns expressed by the NRC had been conducted and that these concerns were summarized in four basic areas. These are:

- The organization and effective use of personnel resources.
- Personnel qualification with respect to professional development and staffing.
- Management effectiveness with respect to timely response and objectives based programs.
- A reassessment of Quality Assurance commitments.

Additionally, the individual concerns expressed by the NRC would be addressed by the licensee's broad-based program, however, no timetable for this response had been formulated.

3. Results

The licensee representative stated that RG&E management is confident that the Ginna Quality Assurance organization is functioning reasonably well, however, improvements are needed and the concerns expressed by the NRC are understood and reasonable. In addition, RG&E management is sensitive to repeat problems and will pursue program improvements in a timely manner. The NRC acknowledged the above comments, reemphasized its concern for appropriate documentation of all audit findings and closed the meeting.

4. Findings

A. PORC Quorum Requirements Not Met

A QA draft audit finding concerned the fact that a Plant Operations Review Committee (PORC) quorum requirement was not satisfied for meeting 83-114. A review of the approved minutes for that meeting revealed less than a quorum documented under the "Members Present" section of the minutes. The licensee subsequently provided information indicating that a quorum was present for meeting 83-114, but that it was not properly documented. The **inspector** identified two other PORC meetings (83-111 and 83-121) for which a quorum was not indicated and also determined that the licensee is improperly interpreting the Technical Specification quorum requirements. Failure to have the required members present at a PORC meeting is contrary to the requirements of Technical Specification 6.5.1.5 and is considered a violation. (84-07-01).

B. Use of An Unapproved Procedure

On December 11, 1981, procedure PT-13.1.15, Revision 0, was used to perform a surveillance test on the Halon Fire Supersession System prior to its effective date of December 14, 1981. Since the date of the Plant Superintendent's approval was not documented, it must be understood to be approved on its "effective" date. Your contention that a procedure can be "approved" before it becomes "effective" is unacceptable. This is contrary to Technical Specification 6.8.2 and licensee procedure A-501, "Plant Procedures Preparation and Classification", Revision 2, and is considered a violation (84-07-02).

C. Failure to Take Corrective Action on Audit Findings

Licensee quality assurance audits identified the problem areas noted in the above violations, however during management review the draft audit findings were eliminated from the audit report and not otherwise evaluated or corrected. This is contrary to 10 CFR 50, Appendix B, Criterion XVI, and is considered a violation (84-07-03).