

NUCLEAR REGULATORY COMMISSION
REGION I

Report No. 50-244/84-05

Docket No. 50-244

License No. DPR-18

Priority -

Category C

Licensee: Rochester Gas & Electric Company

49 East Avenue

Rochester N.Y. 14649

Facility Name: Ginna

Inspection At: Ontario N.Y.

Inspection Conducted: March 19-23 and 27-30, 1984

Inspectors: *J. Durr*

for Harold W. Kerch
Lead Reactor Engineer

5/25/84
date

Robert A. McBrearty
Robert A. McBrearty
Reactor Engineer

May 23, 1984
date

Approved by: *J. Durr*

J. Durr
Chief Materials & Processes Section

5/25/84
date

Inspection Summary: Inspection during March 19-23 and 27-30, 1984 Report No. 244/84-05

Areas Inspected: Routine announced inspection by two region based inspectors. The purpose of this inspection was to verify the adequacy of the licensee's Inservice Inspection Program for the second ten year interval for 1980-1989. The inspectors spent 48 hours at the site and an additional 48 hours were spent at the regional office in the review of the program and procedures.

Results: One violation was identified during the course of this inspection. No formal procedure is available to assure that required changes are made to the ISI program such as modifications (244/84-05-02).

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Details

1. Persons Contacted

Rochester Gas & Electric Corporation

- * C. Anderson, Manager QA
- * A. Curtis, Manager Material/Eng.
- * R. Koager, V.P. Electric Steam Prod.
- * K. Nassauer, Supervisor QC
- * C. Peck, Manager QA
- * M. Saporito, Supervisor Material Eng.
- * B. Snow, Supt. Nuclear Prod.
- S. Spector, Asst. Supt.
- B. Stiene, Engineer QA

NRC

- B. Lazarus, Project Engineer
- * R. Zimmerman, Sr. Resident
- * H. Kerch, Sr. Reactor Engineer
- * R. McBrearty, Reactor Engineer

- * Attended Exit Interview on March 30, 1984.

2. Inservice Inspection (ISI) program

The inspector reviewed the following to ascertain compliance with applicable ASME Code requirements, licensee commitments and regulatory requirements:

- Facility Technical Specification 4.2
- QA Manual, Apperdix B, Revision 7, "Inservice Inspection Program for the 1980-1989 Interval"
- Attachment A to Appendix B, "Exemptions"
- Licensee letter dated 7/2/79 to the NRC, regarding the facility Inservice Inspection Program for the 1980 - 1989 interval
- Licensee letter application to the NRC, dated December 19, 1983, for an amendment to the operating license to permit the adjustment of the ISI program ten year interval start dates so that they will coincide for the second and subsequent intervals.

Based on the foregoing, at the time the ten year interval commenced, 10CFR 50.55a(g), 1979 Edition, the licensee's ISI program is intended to meet the requirements of the ASME Boiler & Pressure Vessel Code, Section XI, 1974 Edition through Summer 1975 Addenda.

The facility Technical Specification 4.2 defines the inspection interval for Quality Group A, Quality Group B and Quality Group C components as follows:

- Quality Group A Components - Ten year intervals of service commencing on January 1, 1970
- Quality Group B and C Components - Ten year intervals of service commencing with May 1, 1973

In his submittal of July 2, 1979, the licensee modified the start date for the Quality Group B and C inspection interval from May 1, 1973 to January 1, 1970. The licensee recognized at that time that a Technical Specification change was required to reflect the new date for the start of the first inspection interval, but did not apply to the NRC for the change until December 19, 1983. The application for the change has not been acted on by the NRC at the time of this inspection. This matter is considered unresolved pending resolution of the Technical Specification change request and NRC review of the matter during a subsequent NRC inspection (244/84-05-01).

Based on the proposed Technical Specification and exemptions for Ginna's ISI program for the 1980-1989 Interval, the inspector reviewed selected portions of the program.

ISI ten year plan
 ISI 23.2 1984 plan
 ISI appendix B program plan for 1980-1989
 ISI appendix B, Attachment A, XV exemptions.

Ginna's ISI program is in its second ten year plan, fourth outage, and was prepared and implemented by the licensee. The plan meets the requirements of the ASME Section XI, 1974 edition including summer 1975 addenda, proposed Technical Specification, XV exceptions and 10CFR50.55.a(g).

The plan is divided into three inspection periods and each period has a computer listing of requirements. Each item on this listing has an inspection report made out and is tracked by computer to assure all inspections are completed. A review of the previous listing indicated all items had been inspected. All documents and procedures reviewed by the inspectors, including the computer listing for the period, were controlled by the licensee.

No violations were identified.

3. Organization and Staffing of The ISI Program

The inspector determined that Ginna's Materials Engineering Group has the prime responsibility for coordinating and conducting the ISI Program,

including inspection schedules, procedures and providing qualified inspection personnel. Ginna's ISI program is performed by the following NDE personnel:

- Ultrasonic examinations are performed by Southwest Research Institute personnel.
- Radiographic, Magnetic Particle, Liquid Penetrant and Visual 1, examinations are performed by licensee personnel.
- Eddy current examinations are performed by licensee personnel supplemented by contractor interpreters.

The inspector concluded that Ginna's ISI program was adequately staffed by site personnel and augmented by contract personnel to properly execute the program.

No violations were identified.

4. Quality Assurance (QA) Audits

The inspector reviewed the below listed documents to ascertain that ISI activities are audited by the QA department and that prospective ISI vendors are also audited prior to their being considered as a qualified supplier of ISI services:

- QA Manual Ginna Station, Section No. 7, Revision 13;
- QA Audit Report No. 83-85: CA, of audit performed on September 20 to October 21, 1983;
- Audit checklist of the above listed audit;
- Audit Report No. VHF-008-12, audit done by Gilbert/Commonwealth of the Southwest Research Institute (SWRI) QA Program - the licensee's ISI vendor.

The audit reports indicated that various aspects of the ISI Program were examined, audit findings were properly closed out, and that the licensee's ISI vendor was properly qualified as a supplier of ISI services.

No violations were identified.

5. Licensee Review of ISI Findings

Licensee personnel were interviewed and the following procedures were reviewed to ascertain that ISI examination findings are properly reviewed

and dispositioned and that items such as modifications are added to the ISI Program:

- Procedure No. A-1003, Revision 5, "Control of Inservice Inspection Activities"
- Procedure No. A-15001, Revision 4, "Control of Nonconformance Items"
- Procedure No. A-1502, Revision 4, "Nonconformance Reports"

The inspector found that the above listed procedures address various aspects of the ISI Program, including evaluation and disposition of examination findings, nonconforming items and maintenance of the program completion status. The procedures do not address items such as modifications which are required to be added to the ISI Program. Interviews with licensee representatives indicated that no formal method is available to assure that required additions are made to the program. The inspector was informed that a procedure addressing the above is being considered by the licensee. The failure to provide adequate procedures to control inspection status is a violation of 10CFR50, appendix B, Criterion XIV (244/84-05-02).

Weld PL-FW-XIV was found, by ultrasonic examination, to contain a reflector which produced a 100% of DAC indication. The pipe to elbow weld is in the reactor coolant loop B, which is fabricated from centrifugally cast stainless steel material. The cause of the indication was attributed to weld root geometry based on a sketch provided by the licensee's ISI vendor. The inspector found that the sketch did not accurately depict the pipe surface contour and no data were available to verify the actual pipe configuration. The sketch showed a flat surface. The licensee stated that the actual surface was curved, which resulted in the ultrasonic beam impinging on the I.D. surface. The reflector location on the sketch was corrected for curvature to place it at the I.D. The inspector questioned the accuracy of the corrected location because of the lack of confirming data. While the inspector's were onsite, the licensee made profile measurements of the weld and requested from Westinghouse the original construction radiographs of the system. These are expected to aid in determining the weld root condition and to verify that a root condition is present which could cause the ultrasonic indication under evaluation. This item is unresolved pending completion of the licensee's action and subsequent review by the NRC (244/84-05-03).

No violations were identified.

The following welds were radiographed during this ISI outage and were reviewed by the inspector:

SMS 1001 J
MS 1001 M
MS 1001 N
MS 1001 H
MS 1001 O
MS 1001 B

Welds MS 1001-0 and MS 1001 B were radiographed with a lead number belt around the weld. The licensee's radiographers were not accurate in the placement of the radiographic cassettes around the weld which resulted in the preceding lead numbers not appearing on some of the radiographs. Also, the radiographic reports did not reflect proper interpretation, in that each discontinuity that appeared in the radiographs was not identified or characterized and its location was not noted.

This is considered unresolved pending completion of the licensee's action and subsequent review by the NRC (244/84-05-04).

6. Qualification of NDE Personnel

The inspector reviewed 19 nondestructive examination (NDE) personnel qualification and certification records and the following are the findings.

Ten individuals did not have current eye examinations posted in the master NDE book located at the site. Nine out of ten of the eye examinations were found. One individual did not have a current eye examination. A review of the records revealed him to be certified as an NDE level I technician. A Level I at Ginna does not sign off any NDE reports. Further, the licensee stated that this individual was designated a Level I technician in the recent past and has not performed any inspections at the Ginna Facility. The licensee is changing the system of controlling eye exams that will prevent this from recurring.

This item is unresolved pending licensee's action and subsequent review by the NRC (244/84-05-05).

The inspector reviewed the procedure QM 909, Rev. 1, dated January 21, 1983, "Qualification and Certification of NDE Personnel". The definition used within this procedure for NDE Level I is applicable to ASME Section III and not to Section XI. This is only a technical procedure change in that there is no evidence that Ginna has used NDE level I technicians to independently perform inspections. Also, within this same procedure, were the qualification requirements for visual personnel. The requirements within this procedure were inadequate and did not represent the actual training and experience used by Ginna. The licensee has committed to procedure changes that will resolve this issue.

This item is unresolved pending licensee's action and subsequent review by the NRC (244/84-05-06).

7. Unresolved Items

Unresolved items are matters about which more information is required in order to ascertain whether they are acceptable, violations or deviations. Unresolved items are discussed within this report in paragraphs 2, 5, and 6.

8. Exit Interview

The inspectors met with licensee representatives, denoted in paragraph 1, at the conclusion of the inspection on March 29, 1984. The inspectors summarized the purpose, scope and findings of the inspection. At no time during this inspection was written material provided to the licensee by the inspectors.