

U.S. NUCLEAR REGULATORY COMMISSION
REGION I

Report No. 50-244/84-04

Docket No. 50-244

License No. DPR-18 Priority -- Category C

Licensee: Rochester Gas and Electric Corporation

89 East Avenue

Rochester, New York 14649

Facility Name: R. E. Ginna Nuclear Power Plant

Inspection At: Ontario, New York

Inspection Conducted: March 20-22, 1984

Inspectors: *M. Shanbaky*
for John R. White
Senior Radiation Specialist

5/23/84
date

M. Shanbaky
for Kimberly R. Barr
Radiation Specialist

5/23/84
date

Approved by: *M. Shanbaky*
M. M. Shanbaky, Chief
Facilities Radiation Protection
Section

5/23/84
date

Inspection Summary:

Inspection on March 20-22, 1984 (Inspection Report No. 50-244/84-04)

Areas Inspected: Special, unannounced safety inspection of the operability of the Post Accident Sampling System. The inspection involved 40 hours on site by two regional inspectors.

Results: Several areas requiring improvement were identified relative to verification of full operability of the Post Accident Sampling System. No violations were identified.

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DETAILS

1.0 Persons Contacted

1.1 Licensee Personnel

- *Stanley M. Specter, Assistant Superintendent
- *Donald E. Filion, Radiochemist
- *Robert C. Mecredy, Manager, Nuclear Engineering
- *William P. Goodman, H.P. Foreman
- *Duane Filkins, Manager, H.P. and Chemistry
- *Charlie Mambretti, Nuclear Engineer
- *Richard Baker, Project Manager
- *David Poole, Program Manager
- *Bruce A. Snow, Superintendent, Nuclear Production
- *Bernard R. Quinn, Corporate Health Physicist

*Denotes those in attendance at the exit meeting held March 22, 1984.

Other licensee or contractor employees were also contacted or interviewed during this inspection.

1.2 NRC Personnel Attending the Exit Meeting

John R. White, Senior Radiation Specialist, Region I
Kimberly R. Barr, Radiation Specialist, Region I
Roy Zimmerman, Senior Resident Inspector
William Cook, Resident Inspector

2.0 Purpose

The purpose of this special inspection was to determine the status, relative to NUREG-0737, of the Post Accident Sampling System as of July 15, 1983, when the system was declared operable.

Areas reviewed during this inspection:

- Implementation of applicable procedures
- Review of start-up test program
- Review of QA acceptance and turnover documentation
- Review of system calibration data
- Review of correspondence related to PASS operability commitment date.

(For detailed lists of documents reviewed see Attachment 1)

3.0 Post Accident Sampling System Review

Within the scope of this inspection, it was determined that the Ginna Post Accident Sampling System (PASS) may not have been fully capable of performing to design specifications when it was declared operable on July 15, 1983.

A thorough review of the Ginna PASS system was conducted based on documentation supporting the turnover and acceptance of that system, including test results associated with the calibration of the system's in-line instrumentation. Further, discussions were held with Quality Assurance, Health Physics and Chemistry personnel who were responsible for conducting, reviewing and verifying these tests.

This review indicated that:

1. The start-up test procedure SM2606.5G provided inadequate acceptance criteria for determining system functional operability.
2. The documentation of tests performed relative to SM2606.5G was confused and without form. Many of the test results were recorded on undated scraps of paper, in notes on the margins of some copies of the procedure, on separate unattached sheets of paper and on the data sheets provided in the procedure.
3. In certain of the analysis parameters, such as pH and dissolved gas concentration, laboratory verification of the standards used to perform the test and calibration was not provided.
4. Though performance test results through July 15, 1983, were never completely satisfactory, the project quality assurance group never generated any adverse surveillance finding or nonconformance report.

Additionally, functional verification of the systems capability to perform dilution of reactor coolant, an essential feature for the determination of radioactivity, was never verified as acceptable when the system was declared operable by the Plant Operations Review Committee on July 15, 1983.

Though the documentation indicates that the PASS may not have been able to perform to design specifications on July 15, 1983, there was enough support to indicate the following relative to NUREG-0737 requirements:

1. The system could acquire samples of reactor coolant and containment atmosphere;
2. The in-line chemical analysis monitors for boron, pH, and dissolved gases were probably operable and functionally sufficient to meet the requirements of NUREG-0737; and,

3. Procedures appeared sufficient to provide adequate laboratory radioactivity measurements of samples of reactor coolant and containment atmosphere.

The programmatic breakdown in administrative controls which permitted this deficient condition was previously addressed in NRC Inspection Report 50-244/83-23, dated December 23, 1983.

In order to validate that the PASS is operational and capable, the licensee has initiated the development of new procedures to verify acceptable performance for each specific function of the system including integrated operational performance. Such functional testing is expected to be completed during the current refueling outage. This item will be examined in a subsequent inspection (84-04-01).

However, the licensee has not yet performed any performance test to validate that the PASS has the capability to provide representative samples. Such validation is necessary to achieve the acceptance criteria specified in NUREG-0737, Item II.B.3. The licensee's action in this area will be examined during a full inspection of the licensee's post-accident and monitoring capability (84-04-02).

4.0 Exit Interview

The inspector met with the licensee's representatives (denoted in Section 1.1) at the conclusion of the inspection on March 22, 1984. The inspector summarized the purpose and scope of the inspection and discussed the findings as described in this report.

At no time during this inspection effort was written material provided the licensee by the NRC inspectors.